



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 1-4722-04426/00007  
01/12/2012**

**Facility Identification Data**

Name: CAITHNESS LONG ISLAND ENERGY CENTER  
Address: 50 ZORN BLVD  
SOUTH YAPHANK, NY 11980

**Owner/Firm**

Name: CAITHNESS LONG ISLAND LLC  
Address: 565 FIFTH AVE 29TH FL  
NEW YORK, NY 10017, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

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Air Permitting Contact:

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**Permit Description**

**Introduction**

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

**Summary Description of Proposed Project**

Caithness Long Island Energy Center is applying for an initial Title V permit. The facility consists of one Siemens Westinghouse 501F combustion turbine ducted into a heat recovery steam generator (HRSG). The combustion turbine primarily fires natural gas with low sulfur distillate oil used as a backup. The HRSG has a natural gas fired duct burner. The facility also has a dual fuel auxiliary boiler, a natural gas



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fired fuel heater, and an emergency diesel fire pump. The facility nominally produces 346 MW of power.

**Attainment Status**

CAITHNESS LONG ISLAND ENERGY CENTER is located in the town of BROOKHAVEN in the county of SUFFOLK.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	SEVERE NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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

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

**Facility Description:**

The facility consists of one Siemens Westinghouse 501F combustion turbine ducted into a heat recovery steam generator (HRSG). The combustion turbine primarily fires natural gas with low sulfur distillate oil used as a backup. The HRSG has a natural gas fired duct burner. The facility also has a dual fuel auxiliary boiler, a natural gas fired fuel heater, and an emergency diesel fire pump. The facility nominally produces 346 MW of power.

**Permit Structure and Description of Operations**

The Title V permit for CAITHNESS LONG ISLAND ENERGY CENTER

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

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that is not included in the above categories.

CAITHNESS LONG ISLAND ENERGY CENTER is defined by the following emission unit(s):

Emission unit U00001 - This emission unit consists of one Siemens-Westinghouse 501F combustion turbine and a duct fired HRSG. The combustion turbine will fire primarily natural gas with distillate oil back-up. The duct burner is limited to firing only natural gas. The turbine uses dry low NO<sub>x</sub> technology and steam injection in combination with a SCR to control emissions of NO<sub>x</sub>. The turbine also employs an oxidation catalyst to control emissions of carbon monoxide, VOCs, and HAPs.

Emission unit U00001 is associated with the following emission points (EP):  
EP001

Process: P01 is located at Building GEN01 - Combustion turbine firing natural gas.

Process: P02 is located at Building GEN01 - Combustion turbine firing natural gas in combination with the duct burner firing natural gas.

Process: P03 is located at Building GEN01 - Combustion turbine firing distillate oil. When the combustion turbine fires distillate oil the heat input is 2,125 mmBtu/hr.

Process: P04 is located at Building GEN01 - Combustion turbine firing distillate oil in combination with the duct burner firing natural gas. During this operating scenario the duct burner is limited to operating at no more than 369 mmBtu/hr heat input.

Process: P09 is located at Building GEN01 - Startup, shutdown, and fuel switching of the combustion turbine for operations using either natural gas or distillate oil.

Emission unit U00002 - This emission unit consists of an auxiliary boiler which fires natural gas as its primary fuel with distillate oil back-up. The boiler uses a low NO<sub>x</sub> burner in combination with flue gas recirculation to control emissions of NO<sub>x</sub>.

Emission unit U00002 is associated with the following emission points (EP):  
EP002

Process: P05 is located at Building GEN01 - Auxiliary boiler firing natural gas.

Process: P06 is located at Building GEN01 - Auxiliary boiler firing distillate oil. When the auxiliary boiler fires distillate oil the heat input is 28.0 mmBtu/hr.

Emission unit U00003 - This emission unit consists of a natural gas fired fuel gas heater and a diesel fire pump.

Emission unit U00003 is associated with the following emission points (EP):  
EP003, EP004

Process: P08 Diesel fire pump operation.

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**Title V/Major Source Status**

CAITHNESS LONG ISLAND ENERGY CENTER is subject to Title V requirements. This determination is based on the following information:

The facility is located in a severe ozone non-attainment area. Potential emissions of Oxides of Nitrogen and Volatile Organic Compounds, 90 and 63 tons per year respectively, bot exceed the major source thresholds of 25 tons per year; therefore, the facility is a major source.

**Program Applicability**

The following chart summarizes the applicability of CAITHNESS LONG ISLAND ENERGY CENTER with regards to the principal air pollution regulatory programs:

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

**NOTES:**

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

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

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

**MACT** Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are



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to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

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

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

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

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

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

**Compliance Status**

Facility is in compliance with all requirements.

**SIC Codes**

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

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

**SIC Code**

**Description**

4911

ELECTRIC SERVICES

**SCC Codes**

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents

a unique process or function within a source category logically associated with a point of air pollution



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emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-005-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-05-001-06	EXTERNAL COMBUSTION BOILERS - SPACE HEATERS INDUSTRIAL SPACE HEATER Natural Gas
2-01-001-01	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Turbine
2-01-002-01	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS Turbine
2-02-001-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating

**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
007664-41-7	AMMONIA		>= 50 tpy but < 100 tpy
000630-08-0	CARBON MONOXIDE	541800	
0NY100-00-0	HAP		>= 2.5 tpy but < 10 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	180600	

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0NY075-00-0	PARTICULATES	>= 50 tpy but < 100 tpy
0NY075-00-5	PM-10	>= 50 tpy but < 100 tpy
007446-09-5	SULFUR DIOXIDE	>= 40 tpy but < 50 tpy
007664-93-9	SULFURIC ACID	>= 10 tpy but < 25 tpy
0NY998-00-0	VOC	125800

**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 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

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

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

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- 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 application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:
- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
  - ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;



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

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

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

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

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

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

**Item L: Permit Exclusion - ECL 19-0305**

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

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

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

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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
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FACILITY	ECL 19-0301	166	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A.11	60	General provisions - compliance with standards and maintenance requirements
FACILITY	40CFR 60-A.12	61	General provisions - Circumvention
FACILITY	40CFR 60-A.13	62	General provisions - Monitoring requirements
FACILITY	40CFR 60-A.14	63	General provisions - Modification
FACILITY	40CFR 60-A.15	64	General provisions - Reconstruction
FACILITY	40CFR 60-A.4	48	General provisions - Address
FACILITY	40CFR 60-A.7(a)	49	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(b)	50	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(c)	51	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(e)	52	Notification and Recordkeeping



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FACILITY	40CFR 60-A.7(f)	53	Notification and Recordkeeping
FACILITY	40CFR 60-A.7(g)	54	Notification and Recordkeeping
FACILITY	40CFR 60-A.8(b)	55	Performance Tests
FACILITY	40CFR 60-A.8(c)	56	Performance Tests
FACILITY	40CFR 60-A.8(d)	57	Performance Tests
FACILITY	40CFR 60-A.8(e)	58	Performance Tests
FACILITY	40CFR 60-A.8(f)	59	Performance Tests
U-00001	40CFR 64	80, 81	COMPLIANCE ASSURANCE MONITORING
U-00001/EP001	40CFR 64	146	COMPLIANCE ASSURANCE MONITORING
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 72	65	Permits regulation
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	9	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	167	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	10	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	11	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 66, 67	Title V Permits and the Associated Permit Conditions
U-00002	6NYCRR 201-6	147	Title V Permits and the Associated Permit Conditions
U-00002/-/P06	6NYCRR 201-6	149, 150	Title V Permits and the Associated Permit Conditions
U-00002/EP002/P05	6NYCRR 201-6	152, 153	Title V Permits and the Associated Permit Conditions
U-00002/EP002/P06	6NYCRR 201-6	154, 155	Title V Permits and the Associated Permit Conditions
U-00003/EP003	6NYCRR 201-6	157, 158	Title V Permits and the Associated Permit Conditions
U-00003/EP004	6NYCRR 201-6	160, 161, 162, 163, 164	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)	22, 23, 24	Standard Permit Requirements
U-00001	6NYCRR 201-6.5(a)	68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79	Standard Permit Requirements
U-00001/-/P01	6NYCRR 201-6.5(a)	82, 83, 84, 85	Standard Permit Requirements



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U-00001/-/P02	6NYCRR 201-6.5(a)	89, 90, 91, 92, 93	Standard Permit Requirements
U-00001/-/P03	6NYCRR 201-6.5(a)	97, 98, 99, 100, 101, 102, 103, 104	Standard Permit Requirements
U-00001/-/P04	6NYCRR 201-6.5(a)	108, 109, 110, 111, 112	Standard Permit Requirements
U-00001/-/P09	6NYCRR 201-6.5(a)	116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145	Standard Permit Requirements
U-00003/EP003	6NYCRR 201-6.5(a)	159	Standard Permit Requirements
FACILITY	6NYCRR 201-6.5(a)(4)	14	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2	General conditions
FACILITY	6NYCRR 201-6.5(a)(8)	15	Fees
FACILITY	6NYCRR 201-6.5(c)	3	General conditions
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)	16	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(e)	25	Compliance schedules
FACILITY	6NYCRR 201-6.5(f)(6)	17	Compliance Certification
FACILITY	6NYCRR 202-1.1	18	Off Permit Changes
FACILITY	6NYCRR 202-2.1	6	Required emissions tests.
FACILITY	6NYCRR 202-2.5	7	Emission Statements - Applicability
FACILITY	6NYCRR 211.1	26	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	168, 169	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 215.2	8	General Prohibitions - visible emissions limited.
U-00002/EP002/P06	6NYCRR 227-1.3	156	Open Fires - Prohibitions
FACILITY	6NYCRR 227-1.3(a)	27	Smoke Emission Limitations.
FACILITY	6NYCRR 231-2	28, 29	Smoke Emission Limitations.
U-00001/-/P01	6NYCRR 231-2	86, 87, 88	New Source Review in Nonattainment Areas and Ozone Transport Region
U-00001/-/P02	6NYCRR 231-2	94, 95, 96	New Source Review in Nonattainment Areas



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U-00001/-/P03	6NYCRR 231-2	105, 106, 107	and Ozone Transport Region New Source Review in Nonattainment Areas and Ozone Transport Region
U-00001/-/P04	6NYCRR 231-2	113, 114, 115	New Source Review in Nonattainment Areas and Ozone Transport Region
U-00002/-/P05	6NYCRR 231-2	148	New Source Review in Nonattainment Areas and Ozone Transport Region
U-00002/-/P06	6NYCRR 231-2	151	New Source Review in Nonattainment Areas and Ozone Transport Region
U-00003/EP004	6NYCRR 231-2	165	New Source Review in Nonattainment Areas and Ozone Transport Region
FACILITY	6NYCRR 231-2.4	30	Permit Requirements
FACILITY	6NYCRR 243-1.6 (a)	31	Permit Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (b)	32	Monitoring Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (c)	33	NOx Ozone Season Emission Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (d)	34	Excess Emission Requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-1.6 (e)	35	Recordkeeping and reporting requirements - CAIR NOx Ozone Season Trading Program
FACILITY	6NYCRR 243-2.1	36	Authorization and responsibilities - CAIR Designated Representative Certificate of representation - CAIR Designated Representative
FACILITY	6NYCRR 243-8.1	38, 39	General Requirements - Monitoring and Reporting
FACILITY	6NYCRR 243-8.5 (d)	40	Quarterly reports re: recordkeeping and reporting - Monitoring and Reporting
FACILITY	6NYCRR 243-8.5 (e)	41	Compliance certification re: recordkeeping and reporting - Monitoring and

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FACILITY	6NYCRR 244-1	42	Reporting CAIR NOx Ozone Annual Trading Program General Provisions
FACILITY	6NYCRR 244-2	43	CAIR Designated Representative for CAIR NOx Sources
FACILITY	6NYCRR 244-8	44	Monitoring and Reporting CAIR NOx Allowances
FACILITY	6NYCRR 245-1	45	CAIR SO2 Trading Program General Provisions
FACILITY	6NYCRR 245-2	46	CAIR Designated Representative for CAIR SO2 Sources
FACILITY	6NYCRR 245-8	47	Monitoring and Reporting for CAIR SO2 Trading Program

**Applicability Discussion:**

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

ECL 19-0301

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

6 NYCRR 200.6

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

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control 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.



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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 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



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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.

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

6 NYCRR 215.2

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



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practices, leak repair practices, recordkeeping and/or technician certification requirements.

**Facility Specific Requirements**

In addition to Title V, CAITHNESS LONG ISLAND ENERGY CENTER has been determined to be subject to the following regulations:

40 CFR 60.11

This regulation specifies the type of opacity monitoring requirements in relation to compliance with the standards and maintenance requirements.

40 CFR 60.12

This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

40 CFR 60.13

This regulation specifies how monitoring shall be performed and which methods and appendices are used to determine if the monitoring is adequate and in compliance with the regulated standards.

40 CFR 60.14

This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.

40 CFR 60.15

This regulation defines the term reconstruction and what is and is not considered to be a reconstruction project, for the purpose of rule applicability.

40 CFR 60.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40 CFR 60.7 (a)

This regulation requires any owner or operator subject to a New Source Performance Standard (NSPS) to furnish the Administrator with notification of the dates of: construction or reconstruction, initial startup, any physical or operational changes, commencement of performance testing for continuous monitors and anticipated date for opacity observations as required.

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 60.7 (e)

This condition specifies how sources that remain in continuous compliance, and are subject to monthly or quarterly reporting, can reduce reporting frequency to semiannually.

40 CFR 60.7 (f)

This condition specifies requirements for maintenance of files of all measurements, including continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40 CFR 60.7 (g)

This condition allows source owners to use reporting required for state or local agencies to satisfy the paragraph (a) reporting requirements of this section of this rule.

40 CFR 60.8 (b)

This regulation contains the requirements for Performance test methods and procedures, to be used by the owner or operator , of the affected facility.

40 CFR 60.8 (c)

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

40 CFR 60.8 (d)

This regulation contains the requirements for advance notification of Performance (stack) testing.

40 CFR 60.8 (e)

This regulation requires the facility to provide appropriate sampling ports, safe platforms and utilities as necessary for Performance (stack) testing.

40 CFR 60.8 (f)

This regulation requires that Performance (stack) tests consist of three runs unless otherwise specified. The rule also designates the allowable averaging methods for the analysis of the results.

40 CFR Part 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of



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compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR Subpart 201-6.

40 CFR Part 72

In order to reduce acid rain in the U.S. and Canada, Title IV of the Clean Air Act Amendments of 1990 requires the establishment of a program to reduce emissions of SO<sub>2</sub> and NO<sub>x</sub> (sulfur dioxide and oxides of nitrogen). Fossil fuel burning electric utility companies are a major source of these contaminants in the US. These sources were regulated in a phased approach. Phase I, which began in 1995, requires 110 of the higher-emitting utility plants in the eastern and Midwest states to meet intermediate SO<sub>2</sub> emission limitations. Phase II, which began in 2000, tightens the emission limitations and expands the coverage to most fossil fuel burning utilities. The utilities are given "allowances" which is a limited authorization to emit one ton of SO<sub>2</sub>. The utilities are required to limit SO<sub>2</sub> emissions to the number of allowances they hold. Some can benefit however by reducing their emissions and selling their excess allowances. Part 72 contains the means of implementing this portion of Title IV of the Clean Air Act.

6 NYCRR 201-6.5 (a)

6 NYCRR 211.1

This regulation requires that 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.

6 NYCRR 227-1.3

This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

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 231-2.4

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment



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contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The permitting requirements for proposed source projects and new major facilities are set forth in section 231-2.4.

6 NYCRR 243-1.6 (a)

This condition requires the facility to acknowledge that they are subject to this CAIR regulation and provide owner and contact information. It also requires them to update this information as it changes or provide supplemental information at the Departments request.

6 NYCRR 243-1.6 (b)

This condition obligates the owners and operators of the facility to comply with the monitoring and reporting requirements of the CAIR regulations.

6 NYCRR 243-1.6 (c)

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

6 NYCRR 243-1.6 (d)

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

6 NYCRR 243-1.6 (e)

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

6 NYCRR 243-2.1

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

6 NYCRR 243-2.4

This condition describes the required elements of the "Certificate of Representation" for the CAIR program and the certifying language required with submissions to the Department.

6 NYCRR 243-8.1

This citation of the Clean Air Interstate Rule (CAIR) NOx Ozone Season Trading Program explains that CAIR NOx Ozone Season Trading Program sources must install, certify and operate monitoring systems the meet the monitoring, recordkeeping, and reporting requirements in Subpart 6 NYCRR 243-8 and in



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Subpart H of 40 CFR Part 75.

6 NYCRR 243-8.5 (d)

This citation of the Clean Air Interstate Rule (CAIR) NO<sub>x</sub> Ozone Season Trading Program explains what requirements the quarterly reports must meet.

6 NYCRR 243-8.5 (e)

This citation of the Clean Air Interstate Rule (CAIR) NO<sub>x</sub> Ozone Season Trading Program explains the compliance certification requirements the source must follow for each quarterly report.

6 NYCRR Subpart 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

6 NYCRR Subpart 244-1

This subpart explains the general provisions of the Clean Air Interstate Rule (CAIR) Nitrogen Oxide (NO<sub>x</sub>) Annual Trading Program. The control period for this annual NO<sub>x</sub> cap and trade program runs from January 1 to December 31 each year, starting in 2009. Each source shall hold a tonnage equivalent in CAIR NO<sub>x</sub> allowances that is not less than the total tons of NO<sub>x</sub> emissions for the control period.

6 NYCRR Subpart 244-2

Each Clean Air Interstate Rule (CAIR) NO<sub>x</sub> source shall have one CAIR designated representative and may have one alternate representative. Each submission for the CAIR NO<sub>x</sub> Annual Trading Program shall be submitted, signed, and certified by the CAIR designated representative or the alternate representative.

6 NYCRR Subpart 244-8

The owners, operators, and Clean Air Interstate Rule (CAIR) designated representative of a CAIR NO<sub>x</sub> unit shall comply with the monitoring, recordkeeping, and reporting requirements as provided in Subpart 6 NYCRR Part 244-8 and in 40 CFR Part 75, Subparts F and G. A certified NO<sub>x</sub> emission monitoring system must be used to measure NO<sub>x</sub> emissions. NO<sub>x</sub> emission reports must be certified and submitted quarterly.

6 NYCRR Subpart 245-1

This subpart explains the general provisions of the Clean Air Interstate Rule (CAIR) sulfur dioxide (SO<sub>2</sub>) Trading Program. The control period for this annual SO<sub>2</sub> cap and trade program runs from January 1 to December 31, starting in the year 2010. Each source shall hold a tonnage equivalent in CAIR SO<sub>2</sub> allowances that is not less than the total tons of SO<sub>2</sub> emissions for the control period.

6 NYCRR Subpart 245-2

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

6 NYCRR Subpart 245-8

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

**Compliance Certification**

**Summary of monitoring activities at CAITHNESS LONG ISLAND ENERGY CENTER:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
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FACILITY	51	record keeping/maintenance procedures
U-00001	80	record keeping/maintenance procedures
U-00001	81	record keeping/maintenance procedures
U-00001/EP001	146	continuous emission monitoring (cem)
U-00002	147	work practice involving specific operations
U-00002/-/P06	149	work practice involving specific operations
U-00002/-/P06	150	work practice involving specific operations
U-00002/EP002/P05	152	intermittent emission testing
U-00002/EP002/P05	153	intermittent emission testing
U-00002/EP002/P06	154	intermittent emission testing
U-00002/EP002/P06	155	intermittent emission testing
U-00003/EP003	157	intermittent emission testing
U-00003/EP003	158	intermittent emission testing
U-00003/EP004	160	work practice involving specific operations
U-00003/EP004	161	work practice involving specific operations
U-00003/EP004	162	work practice involving specific operations
U-00003/EP004	163	intermittent emission testing
U-00003/EP004	164	intermittent emission testing
FACILITY	22	monitoring of process or control device parameters as surrogate
FACILITY	23	monitoring of process or control device parameters as surrogate
FACILITY	24	monitoring of process or control device parameters as surrogate
U-00001	69	continuous emission monitoring (cem)
U-00001	70	monitoring of process or control device parameters as surrogate
U-00001	71	monitoring of process or control device parameters as surrogate
U-00001	72	continuous emission monitoring (cem)
U-00001	73	intermittent emission testing
U-00001	74	work practice involving specific operations
U-00001	75	intermittent emission testing
U-00001	76	work practice involving specific operations
U-00001	77	record keeping/maintenance procedures
U-00001	78	intermittent emission testing
U-00001	79	intermittent emission testing

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U-00001/-/P01	82	intermittent emission testing
U-00001/-/P01	83	continuous emission monitoring (cem)
U-00001/-/P01	84	continuous emission monitoring (cem)
U-00001/-/P01	85	intermittent emission testing
U-00001/-/P02	89	monitoring of process or control device parameters as surrogate
U-00001/-/P02	90	intermittent emission testing
U-00001/-/P02	91	intermittent emission testing
U-00001/-/P02	92	continuous emission monitoring (cem)
U-00001/-/P02	93	continuous emission monitoring (cem)
U-00001/-/P03	97	monitoring of process or control device parameters as surrogate
U-00001/-/P03	98	intermittent emission testing
U-00001/-/P03	99	intermittent emission testing
U-00001/-/P03	100	intermittent emission testing
U-00001/-/P03	101	continuous emission monitoring (cem)
U-00001/-/P03	102	continuous emission monitoring (cem)
U-00001/-/P03	103	continuous emission monitoring (cem)
U-00001/-/P03	104	continuous emission monitoring (cem)
U-00001/-/P04	108	intermittent emission testing
U-00001/-/P04	109	intermittent emission testing
U-00001/-/P04	110	continuous emission monitoring (cem)
U-00001/-/P04	111	continuous emission monitoring (cem)
U-00001/-/P04	112	monitoring of process or control device parameters as surrogate
U-00001/-/P09	119	monitoring of process or control device parameters as surrogate
U-00001/-/P09	120	monitoring of process or control device parameters as surrogate
U-00001/-/P09	121	continuous emission monitoring (cem)
U-00001/-/P09	122	continuous emission monitoring (cem)
U-00001/-/P09	123	monitoring of process or control device parameters as surrogate
U-00001/-/P09	124	continuous emission monitoring (cem)
U-00001/-/P09	125	continuous emission monitoring (cem)
U-00001/-/P09	126	monitoring of process or control device parameters as surrogate
U-00001/-/P09	127	continuous emission monitoring (cem)
U-00001/-/P09	128	continuous emission monitoring (cem)
U-00001/-/P09	129	monitoring of process or control device parameters as surrogate
U-00001/-/P09	130	continuous emission monitoring (cem)
U-00001/-/P09	131	continuous emission monitoring (cem)
U-00001/-/P09	132	continuous emission monitoring (cem)
U-00001/-/P09	133	continuous emission monitoring (cem)
U-00001/-/P09	134	monitoring of process or control device parameters as surrogate
U-00001/-/P09	135	monitoring of process or control device parameters as surrogate
U-00001/-/P09	136	continuous emission monitoring (cem)
U-00001/-/P09	137	continuous emission monitoring (cem)
U-00001/-/P09	138	monitoring of process or control device parameters as surrogate
U-00001/-/P09	139	continuous emission monitoring (cem)
U-00001/-/P09	140	continuous emission monitoring (cem)
U-00001/-/P09	141	record keeping/maintenance procedures
U-00001/-/P09	142	record keeping/maintenance procedures
U-00001/-/P09	143	continuous emission monitoring (cem)
U-00001/-/P09	144	continuous emission monitoring (cem)
U-00001/-/P09	145	monitoring of process or control device parameters as surrogate
U-00003/EP003	159	intermittent emission testing
FACILITY	5	record keeping/maintenance procedures
FACILITY	25	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures



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FACILITY	169	monitoring of process or control device parameters as surrogate
U-00002/EP002/P06	156	record keeping/maintenance procedures
FACILITY	27	intermittent emission testing
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	monitoring of process or control device parameters as surrogate
U-00001/-/P01	86	intermittent emission testing
U-00001/-/P01	87	continuous emission monitoring (cem)
U-00001/-/P01	88	continuous emission monitoring (cem)
U-00001/-/P02	94	intermittent emission testing
U-00001/-/P02	95	continuous emission monitoring (cem)
U-00001/-/P02	96	continuous emission monitoring (cem)
U-00001/-/P03	105	intermittent emission testing
U-00001/-/P03	106	continuous emission monitoring (cem)
U-00001/-/P03	107	continuous emission monitoring (cem)
U-00001/-/P04	113	intermittent emission testing
U-00001/-/P04	114	continuous emission monitoring (cem)
U-00001/-/P04	115	continuous emission monitoring (cem)
U-00002/-/P05	148	intermittent emission testing
U-00002/-/P06	151	intermittent emission testing
U-00003/EP004	165	intermittent emission testing
FACILITY	44	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures

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**Basis for Monitoring**

**Facility Level:**

The facility has a PSD permit which contains emission limits which are stricter than the RACT limits set forth in 6 NYCRR Part 227-2. The PSD limits are incorporated into this permit, in lieu of the less stringent RACT limits.

6 NYCRR Part 201-6.5(a) - Monitoring the sulfur content of the fuel burned at the facility is a means of tracking the plants SO<sub>2</sub> emissions.

6 NYCRR Part 227-1.3(a) - The opacity of the facility's emissions are limited to 20%.

6 NYCRR Part 231-2 - The facility has purchased offsets for emissions of NO<sub>x</sub> and VOC. Monitoring is conducted to ensure that emissions do not exceed the available credits.

**Emission Unit Level:**

40 CFR 64 - The facility's Compliance Assurance Plan for the catalytic oxidizer includes testing the catalyst, inspecting the oxidizer, and monitoring the temperature of the catalytic bed.

6 NYCRR Part 201-6.5(a) - Continuous emissions monitoring is used to ensure compliance with emission limits carried over from the facility's USEPA PSD permit. Emission limits exist for the different operational modes of the facility.

Continuous Emission Monitoring: Carbon Monoxide, Ammonia Slip, and Oxides of Nitrogen

Intermittent Stack Testing: Sulfuric Acid, PM-10, Carbon Monoxide, Oxides of Nitrogen, Volatile Organic Compounds.





**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 1-4722-04426/00007  
01/12/2012**

Recordkeeping and Monitoring: Fuel Usage, Fuel Heat Input

6 NYCRR Part 231-2 - Intermittent emission testing for VOC's is required for the different processes under the emissions offset program; and as part of the facility's CAM plan to verify the functioning of the catalyst in the Catalytic Oxidizer.