

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 7-0822-00014/00009**



**10/30/2006**

**Facility Identification Data**

Name: AES JENNISON  
Address: BAINBRIDGE AFTON RD  
BAINBRIDGE, NY 13733

**Owner/Firm**

Name: AES CREATIVE RESOURCES LP  
Address: 1001 NORTH 19TH ST - 20TH FL  
ARLINGTON, VA 22209, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

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**Permit Description**

**Introduction**

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

**Summary Description of Proposed Project**

THIS IS AN INITIAL TITLE V APPLICATION FOR JENNISON STATION, AN EXISTING ELECTRIC GENERATING STATION. JENNISON STATION CONSISTS OF FOUR BOILERS

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FEEDING STEAM TO TWO GENERATORS. BOILERS 1 AND 2 EXHAUST THROUGH A COMMON STACK AND BOILERS 3 AND 4 EXHAUST THROUGH A COMMON STACK. JENNISON STATION IS PERMITTED TO BURN COAL, WOOD, AND TIRE DERIVED FUEL (TDF) AND COAL TAR SOILS (CTS) AS ALTERNATIVE FUELS GOVERNED BY SPECIAL PERMIT CONDITIONS. ASSOCIATED WITH THE BOILERS IS THE COAL HANDLING SYSTEM, ALTERNATE FUELS HANDLING SYSTEMS, AND OTHER MISCELLANEOUS SOURCES AND ACTIVITIES RELATED TO THE OPERATION OF AN ELECTRIC GENERATING STATION. NO CHANGES IN JENNISON STATION OPERATION ARE CONTEMPLATED AS A RESULT OF THIS PERMIT APPLICATION.

Attainment Status

AES JENNISON is located in the town of BAINBRIDGE in the county of CHENANGO. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

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

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.  
\*\* NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

JENNISON STATION IS AN ELECTRIC GENERATING STATION CONSISTING OF TWO GENERATOR UNITS. STEAM FOR UNIT 1 IS SUPPLIED BY BOILERS 1 AND 2. STEAM FOR UNIT 2 IS SUPPLIED BY BOILERS 3 AND 4. BOILERS 1 AND 2 EXHAUST THROUGH A COMMON STACK, AND BOILERS 3 AND 4 EXHAUST THROUGH A COMMON STACK. EACH BOILER HAS ITS OWN DUCT ENTERING THE RESPECTIVE STACK. JENNISON STATION IS PERMITTED TO BURN COAL, WOOD, AND TIRE DERIVED FUEL (TD) AND COAL TAR SOILS (CTS) AS ALTERNATIVE FUELS GOVERNED BY SPECIAL PERMIT CONDITIONS. ASSOCIATED WITH THE BOILERS ARE A COAL HANDLING SYSTEM (UNLOADING,

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CONVEYING, ETC.), WOOD HANDLING SYSTEM (UNLOADING, CONVEYING, ETC), ALTERNATE FUEL HANDLING SYSTEM (UNLOADING, CONVEYING, ETC) & OTHER MISCELLANEOUS SOURCES & ACTIVITIES RELATED TO THE OPERATION OF AN ELECTRIC GENERATING STATION.

**Permit Structure and Description of Operations**

The Title V permit for AES JENNISON

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

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

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

Emission unit J00001 - JENNISON STATION IS AN ELECTRIC GENERATING STATION CONSISTING OF TWO GENERATOR UNITS. THE FOLLOWING IDENTIFIERS WILL BE USED IN RELATION TO THIS EMISSION UNIT. JENNISON UNIT 1, EMISSION UNIT J00001. JENNISON STACK 1, EMISSION POINT 00001. BOILER 1, EMISSION SOURCE B0001. BOILER 2, EMISSION SOURCE B0002. BOILER 1 ELECTROSTATIC PRECIPITATOR, EMISSION SOURCE ESP01. BOILER 2 ELECTROSTATIC PRECIPITATOR, EMISSION SOURCE ESP02.

THE FOLLOWING PROCESSES ARE ASSOCIATED WITH EMISSION UNIT J00001: BURNING BITUMINOUS OR ANTHRACITE COAL, PROCESS P11; BURNING NO. 2 FUEL OIL, KEROSENE OR DIESEL FUEL, PROCESS P12; BURNING TIRE CHIPS, PROCESS P14; BURNING CLEAN UNADULTERATED WOOD, PROCESS P15; BURNING COAL TAR SOILS, PROCESS P17; INJECTING AMMONIA, PROCESS P19.

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STEAM FOR UNIT 1 IS SUPPLIED BY EMISSION SOURCES B0001 AND B0002. EMISSION SOURCES B0001 AND B0002 EXHAUST THROUGH A COMMON STACK (EMISSION POINT 00001). EACH BOILER HAS ITS OWN DUCT ENTERING THE STACK. EMISSION SOURCES B0001 AND B0002 ARE COMBUSTION ENGINEERING TRAVELING GRATE STOKER BOILERS DESIGN RATED

Emission unit J00001 is associated with the following emission points (EP):  
00001

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

Process: P11 is located at GROUND, Building BOILER - EMISSION SOURCES B0001 AND/OR B0002 FIRING BITUMINOUS OR ANTHRACITE COAL AS THE PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF ELECTROSTATIC PRECIPITATORS AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM-WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P12 is located at GROUND, Building BOILER - EMISSION SOURCES B0001 AND/OR B0002 USING NO. 2 FUEL OIL, DIESEL OR KEROSENE AS A STARTUP FUEL ON AN AS NEEDED BASIS. A FIRE IS ESTABLISHED DURING STARTUP BY PILING WOOD ON THE TRAVELING GRATE, SOAKING IT WITH 5 TO 10 GALLONS OF NO. 2 FUEL OIL, DIESEL FUEL OR KEROSENE, AND LIGHTING IT. OVER THE PAST SEVEN YEARS, EACH BOILER AT JENNISON HAS AVERAGED TEN STARTUPS PER YEAR. THERE ARE NO SPECIFIC FUEL OIL CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P14 is located at GROUND, Building BOILER - EMISSION SOURCES B0001 AND/OR B0002 ARE PERMITTED TO FIRE TIRE-DERIVED FUEL (TIRE CHIPS OR TDF) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS). TDF MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. TDF MAY BE FIRED AT A CONCENTRATION UP TO 30% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER AND IS SUBJECT TO OTHER SPECIAL PERMIT CONDITIONS. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM-WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P15 is located at GROUND, Building BOILER - EMISSION SOURCES B0001 AND/OR B0002 ARE PERMITTED TO FIRE CLEAN UNADULTERATED WOOD AS A PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER).

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

Process: P17 is located at GROUND, Building BOILER - EMISSION SOURCES B0001 AND/OR B0002 ARE PERMITTED TO FIRE NON-HAZARDOUS COAL TAR CONTAMINATED SOILS (CTS) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS). CTS MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. CTS MAY BE FIRED AT A CONCENTRATION UP TO 25% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER AND IS SUBJECT TO OTHER SPECIAL PERMIT CONDITIONS. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00001. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM-WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00001.

Process: P19 is located at GROUND, Building BOILER - EMISSION SOURCES B0001 AND/OR B0002 USE AMMONIA INJECTION ON AN AS-NEEDED BASIS TO HELP CONTROL A BLUE PLUME THAT IS SOMETIMES OBSERVED AT EMISSION POINT 00001. THIS PLUME SEEMS TO BE MORE PREVALENT WHEN THE SULFUR CONTENT OF THE FUEL INCREASES BEYOND A CERTAIN LEVEL. AMMONIA IS INJECTED AT A LOW CONCENTRATION; CONSEQUENTLY, RESIDUAL EMISSIONS ARE LOW.

Emission unit J00002 - JENNISON STATION IS AN ELECTRIC GENERATING STATION CONSISTING OF TWO GENERATOR UNITS. THE FOLLOWING IDENTIFIERS WILL BE USED IN RELATION TO THIS EMISSION UNIT. JENNISON UNIT 2, EMISSION UNIT J00002. JENNISON STACK 2, EMISSION POINT 00002. BOILER 3, EMISSION SOURCE B0003. BOILER 4, EMISSION SOURCE B0004. BOILER 3 ELECTROSTATIC PRECIPITATOR, EMISSION SOURCE ESP03. BOILER 4 ELECTROSTATIC PRECIPITATOR, EMISSION SOURCE ESP04.

THE FOLLOWING PROCESSES ARE ASSOCIATED WITH EMISSION UNIT J00002: BURNING BITUMINOUS OR ANTHRACITE COAL, PROCESS P31; BURNING NO. 2 FUEL OIL, KEROSENE OR DIESEL FUEL, PROCESS P32; BURNING TIRE CHIPS, PROCESS P34; BURNING CLEAN UNADULTERATED WOOD, PROCESS P35; BURNING COAL TAR SOILS, PROCESS P37; INJECTING AMMONIA, PROCESS P39.

STEAM FOR UNIT 2 IS SUPPLIED BY EMISSION SOURCES B0003 AND B0004. EMISSION

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SOURCES B0003 AND B0004 EXHAUST THROUGH A COMMON STACK (EMISSION POINT 00002). EACH BOILER HAS ITS OWN DUCT ENTERING THE STACK. EMISSION SOURCES B0003 AND B0004 ARE COMBUSTION ENGINEERING TRAVELING GRATE STOKER BOILERS DESIGN RATED AT 281 MMBTU/HR MAXIMUM HEAT INPUT. BOTH BOILERS BURN BITUMINOUS OR ANTHRACITE COAL AS THEIR PRIMARY FUEL, WITH A VARIETY OF OTHER FUELS (CLEAN WOOD, TIRE CHIPS, COAL TAR SOIL) ALSO PERMITTED. PROCESSES P31 AND P35 ARE CONSIDERED BASELINE FUELS THAT CAN BE BURNED IN ANY COMBINATION AND PERCENT OF FUEL ENTERING THE BOILER. THE ALTERNATE FUELS (PROCESSES P34, P36, AND P37) CAN ONLY BE MIXED WITH THE PRIMARY FUELS AND BURNED ONE AT A TIME. THE BURNING OF ALTERNATE FUELS IS GOVERNED BY SPECIAL PERMIT CONDITIONS. WOOD SOAKED WITH A FEW GALLONS OF NO. 2 FUEL OIL OR DIESEL FUEL IS USED FOR STARTUP.

EMISSION SOURCES B0003 AND B0004 ARE EACH DESIGN RATED AT 200,000 POUNDS OF STEAM PER HOUR AT 675 PSIG AND 850 DEG F. THIS EQUATES TO A HEAT INPUT OF 281 MMBTU/HR PER EMISSION SOURCE. EMISSION SOURCES B0003 AND B0004 ARE EACH EQUIPPED WITH AN ELECTROSTATIC PRECIPITATOR (ENVIRONMENTAL ELEMENTS CORPORATION, A DIVISION OF KOPPERS) TO CONTROL PARTICULATE MATTER EMISSIONS. THE PRECIPITATORS ARE EQUIPPED WITH AN INTERMITTENT ENERGIZATION CONTROL SYSTEM TO HELP CONSERVE ENERGY. SPECIAL PERMIT Emission unit J00002 is associated with the following emission points (EP): 00002

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

Process: P31 is located at GROUND, Building BOILER - EMISSION SOURCE B0003 AND/OR B0004 FIRING BITUMINOUS OR ANTHRACITE COAL AS PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM-WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P32 is located at GROUND, Building BOILER - EMISSION SOURCES B0003 AND/OR B0004 USING NO. 2 FUEL OIL, DIESEL OR KEROSENE AS A STARTUP FUEL ON AN AS NEEDED BASIS. A FIRE IS ESTABLISHED DURING STARTUP BY PILING WOOD ON THE TRAVELING GRATE, SOAKING IT WITH 5 TO 10 GALLONS OF NO. 2 FUEL OIL, DIESEL FUEL OR KEROSENE, AND LIGHTING IT. OVER THE PAST SEVEN YEARS, EACH BOILER AT JENNISON HAS AVERAGED TEN STARTUPS PER YEAR. THERE ARE NO SPECIFIC FUEL OIL CONTROLS FOR SULFUR DIOXIDE OR NITROGEN OXIDES EMISSIONS. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P34 is located at GROUND, Building BOILER - EMISSION SOURCES B0003 AND/OR B0004 ARE PERMITTED TO FIRE TIRE-DERIVED FUEL (TIRE CHIPS OR TDF) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS). TDF MAY NOT BE MIXED

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WITH ANY OTHER ALTERNATE FUEL. TDF MAY BE FIRED AT A CONCENTRATION UP TO 30% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER AND IS SUBJECT TO OTHER SPECIAL PERMIT CONDITIONS. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM-WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P35 is located at GROUND, Building BOILER - EMISSION SOURCES B0003 AND/OR B0004 ARE PERMITTED TO FIRE CLEAN UNADULTERATED WOOD AS A PRIMARY BASELINE FUEL (0-100% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER). PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM-WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P37 is located at GROUND, Building BOILER - EMISSION SOURCES B0003 AND B0004 ARE PERMITTED TO FIRE NON-HAZARDOUS COAL TAR CONTAMINATED SOILS (CTS) WITH COAL AND/OR CLEAN UNADULTERATED WOOD (BASELINE FUELS). CTS MAY NOT BE MIXED WITH ANY OTHER ALTERNATE FUEL. CTS MAY BE FIRED AT A CONCENTRATION UP TO 25% BY WEIGHT OF TOTAL FUEL ENTERING THE BOILER AND IS SUBJECT TO OTHER SPECIAL PERMIT CONDITIONS. PARTICULATE MATTER EMISSIONS ARE CONTROLLED BY THE USE OF AN ELECTROSTATIC PRECIPITATOR AND MEASURED (WHEN REQUESTED BY DEC) AT EMISSION POINT 00002. SULFUR DIOXIDE EMISSIONS ARE CONTROLLED BY LIMITING THE SULFUR CONTENT OF THE TOTAL FUEL. NITROGEN OXIDES EMISSIONS ARE CONTROLLED THROUGH GOOD COMBUSTION PRACTICES. NITROGEN OXIDES LIMITS ON A SYSTEM-WIDE BASIS ARE ESTABLISHED IN AES NEW YORK'S NOX RACT COMPLIANCE PLAN. SULFUR DIOXIDE AND NITROGEN OXIDES EMISSIONS ARE MEASURED BY THE CONTINUOUS EMISSION MONITORING SYSTEM ON EMISSION POINT 00002.

Process: P39 is located at GROUND, Building BOILER - EMISSION SOURCES B0003 AND B0004 USE AMMONIA INJECTION ON AN AS-NEEDED BASIS TO HELP CONTROL A BLUE PLUME THAT IS SOMETIMES OBSERVED AT EMISSION POINT 00002. THIS PLUME SEEMS TO BE MORE PREVALENT WHEN THE SULFUR CONTENT OF THE FUEL INCREASES BEYOND A CERTAIN LEVEL. AMMONIA IS INJECTED AT A LOW CONCENTRATION; CONSEQUENTLY, RESIDUAL EMISSIONS ARE LOW.

Emission unit J00003 - JENNISON STATION IS AN ELECTRIC GENERATING STATION CONSISTING OF TWO GENERATOR UNITS. THE FOLLOWING IDENTIFIERS WILL BE USED

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IN RELATION TO THIS EMISSION UNIT. COAL HANDLING SYSTEM, EMISSION UNIT J00003. BELT CONVEYOR 1, EMISSION SOURCE C0001. BELT CONVEYOR 2, EMISSION SOURCE C0002. BUCKET CONVEYOR, EMISSION SOURCE C0003. BELT CONVEYOR 3, EMISSION SOURCE C0004. STANDBY BUCKET ELEVATOR, EMISSION SOURCE C0005. BELT CONVEYOR 4, EMISSION SOURCE C0006. UNLOADING RAIL CAR, PROCESS PC1. UNLOADING TRUCK, PROCESS PC2. CONVEYING COAL, PROCESS PC3.

COAL IS DELIVERED TO JENNISON STATION BY TRAIN AND TRUCK. COAL IS UNLOADED FROM THE RAIL CARS BY A HERZOG (NOTE: A HERZOG IS A TRACTOR WITH A BACKBONE WITH SPECIAL "FEET" THAT ALLOW IT TO WALK ALONG THE TOP OF A RAIL CAR AND SCOOP THE COAL OUT) INTO A HOPPER LOCATED BESIDE THE TRACKS. BELT CONVEYOR 1 CARRIES THE COAL FROM THE HOPPER TO THE COAL STORAGE PILE. COAL DELIVERED BY TRUCK IS DUMPED DIRECTLY ON THE COAL STORAGE PILE. A BULLDOZER IS USED TO SHAPE THE PILE AND RECLAIM COAL FROM THE STORAGE PILE BY PUSHING THE COAL INTO A RECLAIM HOPPER. THE RECLAIM HOPPER DISCHARGES THROUGH A RECIPROCATING FEEDER TO BELT CONVEYOR 2. BELT CONVEYOR 2 DELIVERS COAL TO THE BUCKET CONVEYOR. THE BUCKET CONVEYOR RAISES THE COAL TO THE TOP OF THE BOILER/TURBINE BUILDING AND DISCHARGES INTO A FLOP GATE. THE FLOP GATE DIRECTS THE COAL TO EITHER BELT CONVEYOR 3 OR TO THE COAL STORAGE PILE THROUGH A DISCHARGE CHUTE. COAL MAY ALSO BE RECLAIMED BY A BULLDOZER PUSHING THE COAL INTO AN EMERGENCY RECLAIM HOPPER WHICH FEEDS A STANDBY BUCKET ELEVATOR. THE STANDBY BUCKET ELEVATOR RAISES THE COAL TO THE TOP OF THE BOILER/TURBINE BUILDING AND DISCHARGES ONTO BELT CONVEYOR 3. BELT CONVEYOR 3 CARRIES THE COAL INTO THE BOILER/TURBINE BUILDING AND DISCHARGES TO BELT CONVEYOR 4. BELT CONVEYOR 4 DELIVERS COAL TO THE BUNKERS FOR EMISSION SOURCES B0001, B0002, B0003 AND B0004. THE COAL HANDLING SYSTEM HAS A NOMINAL CAPACITY OF 100 TONS PER HOUR. ALL OUTSIDE CONVEYORS ARE ENCLOSED ON THREE SIDES FOR DUST CONTROL.

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

Process: PC1 Coal is unloaded from rail cars by a Herzog into a hopper located beside the tracks. Belt conveyor 1 carries the coal from the hoppers to the coal storage pile. A Herzog is a tractor with a backhoe with special feet that allow it to walk along the top of a rail car and scoop the coal out.

Process: PC2 Coal delivered by truck is dumped directly on the coal storage pile. A bulldozer is used to shape the pile and reclaim coal from the storage pile by pushing the coal into a reclaim hopper. The reclaim hopper discharges through a reciprocating feeder to belt conveyor 2.

Process: PC3 Coal handling and conveying systems. Belt conveyor 2 delivers coal to the bucket conveyor. The bucket conveyor raises the coal to the top of the boiler/turbine building and discharges into a flop gate. The flop gate directs the coal to either belt conveyor 3 or to the coal storage pile through a discharge chute.

Coal may also be reclaimed by a bulldozer pushing the coal into an emergency reclaim hopper which feeds a standby bucket elevator. The standby bucket elevator raises the coal to the top of the boiler/turbine building and discharges onto belt conveyor 3.



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Belt conveyor 3 carries the coal into the boiler/turbine building and discharges to belt conveyor 4. Belt conveyor 4 delivers coal to the bunkers for Emission Sources B0001, B0002, B0003, and B0004.

The coal handling system has a nominal capacity of 100 tons per hour. All outside conveyors are enclosed on three sides for dust control.

**Title V/Major Source Status**

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

The facility is major based on potential annual emissions of SO<sub>2</sub>, NO<sub>x</sub>, Particulates and HAPs.

**Program Applicability**

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

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

**NOTES:**

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

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

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

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

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

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

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

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

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

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**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.

<b>SIC Code</b>	<b>Description</b>
4911	ELECTRIC SERVICES

**SCC Codes**

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

<b>SCC Code</b>	<b>Description</b>
1-01-002-05	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - BITUMINOUS COAL TRAVELING GRATE (OVERFEED) STOKER_(BITUMINOUS COAL)
1-01-005-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - DISTILLATE OIL Grades 1 and 2 Oil
1-01-012-01	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - SOLID WASTE Specify Waste Material in Comments
1-01-009-03	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION ELECTRIC UTILITY BOILER - WOOD/BARK WASTE Wood-Fired Boiler
3-05-101-03	MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS CONVEYORS Coal
3-05-103-03	MINERAL PRODUCTS MINERAL PRODUCTS - BULK MATERIALS OPEN STOCKPILES Coal

**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic

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compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000630-08-0	CARBON MONOXIDE		>= 250 tpy
0NY100-00-0	HAP		>= 250 tpy
007439-92-1	LEAD (HAP)		> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 250 tpy
0NY075-00-0	PARTICULATES		>= 250 tpy
0NY075-00-5	PM-10		>= 250 tpy
007446-09-5	SULFUR DIOXIDE		>= 250 tpy
0NY998-00-0	VOC		> 0 but < 2.5 tpy

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within

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two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

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

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

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

**Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6**

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**NYCRR Part 201-6.5(a)(3)**

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

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

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

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

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

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

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

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

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and

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substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

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

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

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

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

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exists.

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

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

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

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

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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



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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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>	<b>Condition</b>
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	79
FACILITY	40CFR 68	Chemical accident prevention provisions	55
J-00001	40CFR 72-A.6 (a) (2)	The Facilities which are in Phase 2 of Title IV and are listed in Table 2 or 3 of 40 CFR Part 73.10.	59
J-00002	40CFR 72-A.6 (a) (2)	The Facilities which are in Phase 2 of Title IV and are listed in Table 2 or 3 of 40 CFR Part 73.10.	69
J-00001/00001	40CFR 73	Sulfur Dioxide allowance system	67
J-00002/00002	40CFR 73	Sulfur Dioxide allowance system	77
J-00001/00001	40CFR 75	Continuous emission monitoring	68
J-00002/00002	40CFR 75	Continuous emission monitoring	78
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	56
FACILITY	6NYCRR 200.5	Sealing.	1
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	2
FACILITY	6NYCRR 200.7	Maintenance of equipment.	3
FACILITY	6NYCRR 201-1.10(b)	Permitting - public access to records kept for Title V permitting	8
FACILITY	6NYCRR 201-1.2	Permitting - unpermitted emission sources	4
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	80
FACILITY	6NYCRR 201-1.5	Emergency defense	5
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	6
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of	7

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		collected contaminants to the air	
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	9
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	10
FACILITY	6NYCRR 201-5	State Facility Permit General Provisions	81
FACILITY	6NYCRR 201-5.3(b)	Permit Content and Terms of Issuance - permit conditions	82
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 57, 58
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	24
FACILITY	6NYCRR 201-6.5(c)(2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	25
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	26
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	27
FACILITY	6NYCRR 201-6.5(g)	Permit shield	28, 29
FACILITY	6NYCRR 202-1.1	Required emissions tests.	30
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	31
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	32
FACILITY	6NYCRR 204-1.6	Standard Requirements	33
FACILITY	6NYCRR 204-2.1	Authorization and Responsibilities of the NOx Authorized Account Representative	34
FACILITY	6NYCRR 204-4.1	Compliance Certification Report	35, 36, 37
FACILITY	6NYCRR 204-7.1	Submission of NOx Allowance Transfers	38
FACILITY	6NYCRR 204-8.1	General Requirements	40, 41, 42
FACILITY	6NYCRR 204-8.2	Initial Certification and Recertification Procedures	43, 44
FACILITY	6NYCRR 204-8.3	Out of Control Periods	45
FACILITY	6NYCRR 204-8.4	Notifications	39
FACILITY	6NYCRR 204-8.7	Additional Requirements to Provide Heat Input Data for Allocations Purposes	46
FACILITY	6NYCRR 207	Control Measures for an Air Pollution Episode	47
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution	83

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FACILITY	6NYCRR 211.3	prohibited. General Prohibitions - visible emissions limited	48
FACILITY	6NYCRR 215	Open Fires	49
J-00001/-/P12	6NYCRR 225-1.2(d)	Sulfur-in-fuel limitations - Table 2	60
J-00002/-/P32	6NYCRR 225-1.2(d)	Sulfur-in-fuel limitations - Table 2	70
J-00001/00001	6NYCRR 225-1.5(b)	General Variances Equivalent Emission Rate.	61, 62, 63
J-00002/00002	6NYCRR 225-1.5(b)	General Variances Equivalent Emission Rate.	71, 72, 73
J-00001/00001	6NYCRR 227-1.2(a)(4)	Particulate Emissions Firing Solid Fuels.	64
J-00002/00002	6NYCRR 227-1.2(a)(4)	Particulate Emissions Firing Solid Fuels.	74
J-00001/00001	6NYCRR 227-1.3	Smoke Emission Limitations.	65
J-00002/00002	6NYCRR 227-1.3	Smoke Emission Limitations.	75
J-00001/00001	6NYCRR 227-1.4(a)	Stack Monitoring. (see narrative)	84
J-00002/00002	6NYCRR 227-1.4(a)	Stack Monitoring. (see narrative)	85
J-00001/00001	6NYCRR 227-2.5(b)	System-wide averaging option.	66
J-00002/00002	6NYCRR 227-2.5(b)	System-wide averaging option.	76
FACILITY	6NYCRR 227-3.12	AARs - Authorized Account Representatives.	50
FACILITY	6NYCRR 227-3.13	Emissions Monitoring	
51 FACILITY	6NYCRR 227-3.15	Reporting	52
FACILITY	6NYCRR 227-3.16	Annual Reconciliation of Allowances and NOx Emissions	53
FACILITY	6NYCRR 227-3.17	Compliance Certification	54

**Applicability Discussion:**

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

ECL 19-301.

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

6NYCRR Part 200-.5

Allows for the sealing of non-compliant air contamination sources

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality

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standards without mitigating measures

6NYCRR Part 200-.7

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

6NYCRR Part 201-1.2

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.5

An enforcement action may be avoided if the facility can demonstrate that an emergency situation occurred which resulted in an emission limitation or permit violation. The following information would constitute evidence of an emergency situation: a properly signed operating log recorded during the actual event which; identifies the cause(s) of the emergency, indicates that all equipment was operating properly at the time, the person responsible took all reasonable steps to minimize the exceedance or violation, and that the department was notified of the emergency within 2 working days of the event.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-1.10(b)

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

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6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

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

6NYCRR Part 201-5

This regulation applies to those permit terms and conditions which are not federally enforceable. It specifies the applicability criteria for state facility permits, the information to be included in all state facility permit applications as well as the permit content, terms of permit issuance, and sets guidelines for modifying state facility permits and allowing for operational flexibility. For permitting purposes, this rule specifies the need to list all emission units except those that are exempt or trivial pursuant to Subpart 201-3 in the permit application and provide a description of the emission unit's processes and products. Finally, this rule also provides the Department the authority to include this and any other information that it deems necessary to identify applicable Federal standards, recordkeeping and reporting requirements, and establish terms and conditions that will ensure compliance with the national ambient air quality standards.

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with

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applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR Part 201-6.5(c)

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

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

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

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

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

6NYCRR Part 201-6.5(e)

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

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1

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

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6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-.2

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

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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

40 CFR Part 82, Subpart F

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

**Facility Specific Requirements**

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

40CFR 68

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

40CFR 72-A.6 (a) (2)

This section references tables containing a list of utilities affected by Phase II of Title IV of the Clean Air Act. It also references the exceptions, or those that are exempt.

40CFR 73

The purpose of this part is to establish the requirements and procedures for allocating sulfur dioxide emissions allowances and how to manage them.

40CFR 75

Part 75 establishes the requirements for the monitoring, record keeping, and reporting for sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and carbon dioxide (CO<sub>2</sub>) emissions and other data to be gathered by facilities affected by the Acid Rain Program

6NYCRR 201-6.5 (c)

This requirement specifies what information must be included in any records and reports that are to be maintained or submitted as a result of any compliance monitoring. Records of all monitoring data and support information is to be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Reports of any required monitoring as a result of a federally applicable requirement needs to be submitted every 6 months, at a minimum. Finally, the permit needs to include a notification and reporting process for permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5 (c) (2)

This requirement specifies what information must be included in any records and reports that are to be maintained or submitted as a result of any compliance monitoring. Records of all monitoring data and support information is to be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Reports of any required monitoring as a result of a federally applicable requirement needs to be submitted every 6 months, at a minimum. Finally, the permit needs to include a notification and reporting process for permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

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

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



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6NYCRR 204-1.6

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

6NYCRR 204-2.1

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

6NYCRR 204-4.1

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

6NYCRR 204-7.1

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

6NYCRR 204-8.1

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

6NYCRR 204-8.2

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

6NYCRR 204-8.3

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

6NYCRR 204-8.4

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

6NYCRR 204-8.7

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

6NYCRR 207

This regulation requires the owner or operator to submit an episode action plan to the Department in accordance with the requirements of 6NYCRR Part 207. The plan must contain detailed steps which will be taken by the facility to reduce air contaminant emissions during each stage of an air pollution episode. Once approved, the facility shall take whatever actions are prescribed by the episode action plan when an air pollution episode is in effect.

6NYCRR 225-1.2 (d)

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

6NYCRR 225-1.5 (b)

This regulation allows the Commissioner of NYSDEC to grant a variance from the sulfur-in-fuel limitations in Tables 1,2 or 3 of 6 NYCRR Part 225-1.2 if the source owner can demonstrate that the emissions of sulfur dioxide will be not be greater than if compliant fuel was used.

6NYCRR 227-1.2 (a) (4)

This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units which fire solid fuels at variable sizes of heat input (mmBtu/hr).

6NYCRR 227-1.3

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

6NYCRR 227-1.4 (a)

Subdivisions (a) and (f) of this section (227-1.4) have not been approved by EPA and have not been included in the NYS SIP.

6NYCRR 227-2.5 (b)

The system-wide average shall consist of a weighted average allowable emission rate based upon the weighted average of actual emissions from units that are operating. Excess reductions utilized in the system-wide average may only be counted from the lowest allowable emission rate. Simply put, if there is a more stringent emission limit than RACT already in place on the unit, then excess reductions may only be counted from below that emission rate.

6NYCRR 227-3.12

This condition requires the facility to have an Authorized Account Representative for the Pre 2003 NOx Budget Trading Program.

6NYCRR 227-3.13

This condition included the emissions monitoring requirements for the Pre 2003 NOx Budget Trading Program.

6NYCRR 227-3.15

This condition spells out the reporting requirements for the Pre 2003 NOx Budget Trading Program.

6NYCRR 227-3.16

This condition spells out the requirements for surrender of allowances for the Pre 2003 NOx Budget Program.

6NYCRR 227-3.17

This condition lists the requirements for compliance certification for the Pre 2003 NOx Budget Trading Program.

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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.

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Short Description</b>	<b>Regulation</b>
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FACILITY	General Process Emission Sources	6NYCRR 212
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Reason: The following conditions apply to burning alternative the following alternative fuels at Jennison Station: Tire Derived Fuel (TDF) and Coal Tar Contaminated Soil (CTS). In accordance with the Department's policy on burning alternative fuels, compliance with the following conditions allow the burning of TDF and CTS to be regulated as stationary combustion source and not as a process emission source subject to 6 NYCRR Part 212.

1. The six minute average for stack opacity shall not exceed 15% for 96.0% of all observations; except that during soot blowing, opacity shall not exceed 20%. With respect to conditions related to start up, shut down, and/or malfunctions; AES shall comply with 6 NYCRR 201-1.4. The limits contained herein apply to the use of all fuels, wastes and combinations thereof.

Within 60 days of the end of each calendar year quarter that either TDF and/or CTS is burned at Jennison Station, AES shall submit a quarterly exception report to the Regional Air Pollution Control Engineer (RAPCE) detailing any and all non-compliance with the provisions of this paragraph for each period of alternative fuel combustion.

- A. Date(s) of excursions and hour(s) of the day(s)
- B. Minutes of excursion during any hour (eg., 18-46)
- C. Average opacity (COM data) for the excursion period.
- D. Remarks to account for excursion(s), including soot blowing, startup/shutdown, ESP problems, fuel/combustion problems, etc.
- E. Total monthly hours of alternative fuel combustion, summarized by fuel monthly.
- F. Operating parameters of the ESP.

2. Carbon monoxide (CO) and Oxygen (O2) shall be monitored continuously and recorded for all periods that TDF or CTS is co-fired with coal. The CO and O2 probes shall be colocated. These monitors shall be maintained and calibrated in accordance with a Department approved Quality Assurance Plan.

3. AES shall operate the Electrostatic Precipitator (ESP) for each unit at full power with all fields in service (maximum collection efficiency) at all times when TDF or CTS are fired in the boilers. AES shall identify in the quarterly report required in condition 1 above any periods of TDF or CTS firing in the boilers. AES shall identify in the quarterly reports required in condition #1 above any periods of TDF or CTS firing that occur without the ESP operating at its maximum collection efficiency. For such periods, AES shall document the cause of each operation and the corrective action taken, if any, to prevent reoccurrence.

4. AES must adhere to the Waste Control Plan submitted by NYSEG letter dated June 25, 1992 for the TDF project.

5. AES must adhere to the Contingency Plan submitted by NYSEG letter dated June 25, 1992 designed to minimize hazards to the environment resulting from fires, or releases into the air, groundwater, or surface water from the storage of TDF

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at the facility.

6. AES must comply with the Closure Plan submitted by NYSEG letter dated June 25, 1992 in the event that TDF is no longer used as an alternative fuel at the facility.

7. AES must store TDF only in an area that has adequate run-on and run-off control at the facility.

8. AES shall continue a tire chipping program in New York State which will produce TDF from old waste tire piles. The goal of this program is to produce 10% of the permittee's TDF supply from this source. AES will report quarterly on the progress of this program as part of the TDF project.

9. No more than one type of alternative fuel may be burned at any one time in any one boiler. To assure that burning of co-mixed CTS and TDF does not occur, AES shall use the following fuel bunkering process:

- Whenever CTS or TDF is bunkered, records will be maintained of the amount of material bunkered, when it was bunkered, and to which bunkers it was added.

- Before the fuel is switched to another alternative fuel, a minimum of 350 tons of coal will be added to the bunker.

a. In accordance with 6 NYCRR 225-1.5(a), AES may receive high sulfur (>2.5 lb/mmBtu sulfur) CTS at this facility provided that the CTS shall be blended with coal prior to firing in accordance with Section C of the Coal Tar Soil Management Plan.

b. AES shall limit the amount of CTS to be blended with coal such that CTS shall not exceed 25 percent of the mixture by weight.

c. AES must calculate the maximum percentage of CTS that may be blended for each shipment of CTS that is received on-site. The calculations must be done in accordance with 6 NYCRR 225-1.5(a) and Department Air Program Memo 24.

d. Copies of the maximum percent blend calculation and the as-fired SO<sub>2</sub> test results for each CTS shipment must be maintained at the facility for three years after the date of firing of the CTS. These files must be made available upon request from DEC.

e. In accordance with 6 NYCRR 225-1.5(a), AES must comply with the monitoring and recordkeeping requirements of 6 NYCRR 225-1.7.

f. The burning of CTS is required to meet the NO<sub>x</sub> limitations as stated in the AES New York's NO<sub>x</sub> RACT monitoring plan.

g. Nothing in these special conditions shall be construed in such a manner as to release AES from its obligation to comply with all other permit conditions and applicable state and federal regulations, either present or future.

10. AES shall prepare and submit an annual report on or before March 1 of each year that CTS or TDF was burned during the previous calendar year. The report shall include the following:

- A. A narrative of CO performance corrected to 7% O<sub>2</sub>.

- B. A physical mass balance for materials into and out of the facility for TDF and CTS (tons in - metal out - ash out, etc.)

- C. A narrative on the impact(s) of CTS co-firing on the unit and its subparts, the station, the community and the origin/status of CTS within the scope of solid waste management in New York State.

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D. If the 10% goal in paragraph 8 is not achieved for the period covered by the Annual Report, AES must evaluate the reasons why, and recommend an implementation plan to meet the 10% goal.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

**Compliance Certification**

Summary of monitoring activities at AES JENNISON:

<b>Location Facility/EU/EP/Process/ES</b>	<b>Type of Monitoring</b>	<b>Cond No.</b>
J-00001/00001	continuous emission monitoring (cem)	67
J-00002/00002	continuous emission monitoring (cem)	77
J-00001/00001	continuous emission monitoring (cem)	68
J-00002/00002	continuous emission monitoring (cem)	78
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	27
FACILITY	record keeping/maintenance procedures	31
FACILITY	record keeping/maintenance procedures	37
FACILITY	record keeping/maintenance procedures	44
FACILITY	record keeping/maintenance procedures	39
FACILITY	record keeping/maintenance procedures	46
FACILITY	record keeping/maintenance procedures	47
J-00001/-/P12	monitoring of process or control device parameters as surrogate	60
J-00002/-/P32	monitoring of process or control device parameters as surrogate	70
J-00001/00001	continuous emission monitoring (cem)	61
J-00001/00001	continuous emission monitoring (cem)	62
J-00001/00001	continuous emission monitoring (cem)	63
J-00002/00002	continuous emission monitoring (cem)	71
J-00002/00002	continuous emission monitoring (cem)	72
J-00002/00002	continuous emission monitoring (cem)	73
J-00001/00001	intermittent emission testing	64
J-00002/00002	intermittent emission testing	74
J-00001/00001	continuous emission monitoring (cem)	65
J-00002/00002	continuous emission monitoring (cem)	75
J-00001/00001	monitoring of process or control device parameters as surrogate	84
J-00002/00002	monitoring of process or control device parameters as surrogate	85
J-00001/00001	continuous emission monitoring (cem)	66
J-00002/00002	continuous emission monitoring (cem)	76
FACILITY	record keeping/maintenance procedures	51
FACILITY	record keeping/maintenance procedures	52
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**Basis for Monitoring**

The monitoring conditions in the Title V permit come either directly from regulation or were derived to assure compliance with the Department's alternative fuel policy.