Division of Air Resources

Permit Review Report

Permit ID: 4-1922-00055/00005
Renewal Number: 2
07/01/2022

Facility Identification Data
Name: ATHENS GENERATING PLANT
Address: 9300 US RTE 9W
ATHENS, NY 12015

Owner/Firm
Name: NEW ATHENS GENERATING COMPANY LLC
Address: 9300 US RTE 9W
PO BOX 349
ATHENS, NY 12015-0349, USA
Owner Classification: Corporation/Partnership

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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
Application for renewal of Air Title V Facility Permit. The application also includes several proposed modifications to the current Title V Permit to incorporate regulatory updates, facility-requested changes and administrative corrections.

Attainment Status
ATHENS GENERATING PLANT is located in the town of ATHENS in the county of GREENE.
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*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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

Facility Description:
Natural gas fired combined cycle facility rated at 1080 MW. The facility consists of 3 Westinghouse Model 501G gas turbines (245 MW base load), heat recovery steam generators, and steam turbine generators (115MW) with selective catalytic reduction (SCR) for NOx emission control. The alternate fuel is distillate fuel oil with a limit of 1080 hours/year for each turbine. The facility has a 4 million gallon distillate oil tank, three aqueous ammonia tanks (20,000 gallons each) and an emergency diesel generator and diesel fire pump.

Permit Structure and Description of Operations
The Title V permit for ATHENS GENERATING PLANT
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.

ATHENS GENERATING PLANT is defined by the following emission unit(s):

Emission unit U00002 - Emission Unit U00002 consists of a Westinghouse model 501G combustion turbine (245 MW base load at ISO conditions) with heat recovery steam generator and steam turbine (115 MW base load). The turbine employs dry low NOx technology and normally operates on natural gas. Distillate oil operation is limited to 1080 hours/yr. Steam (or water) injection is used during oil firing to reduce NOx emissions. Total heat rating is 3100 mmBtu/hr. NOx emissions from the combustion turbines are additionally controlled by selective catalytic reduction (SCR) with ammonium hydroxide injection.

Emission unit U00002 is associated with the following emission points (EP):
00002
Process: 2BD is located at 2, Building TB - Westinghouse Model 501G combustion turbine firing low sulfur (<0.05%) distillate fuel oil with maximum input rating of 2940 mmbtu/hr. NOx emissions are controlled with water/steam injection and SCR using aqueous ammonia injection. Base load operation, rated 245 MW at ISO conditions.

Process: 2BG is located at 2, Building TB - Westinghouse Model 501G combustion turbine firing natural gas with maximum input rating of 3100 mmbtu/hr. NOx emissions are controlled with dry low-NOx combustion technology and SCR using aqueous ammonia injection. Base load operation, rated 245 mw at ISO conditions.

Process: 2MD Westinghouse Model 501G combustion turbine firing low sulfur (<0.05%) distillate fuel oil with maximum input rating of 2940 mmbtu/hr. NOx emissions are controlled with water or steam injection and SCR using aqueous ammonia injection. The minimum operating load is the Minimum Emissions Compliance Load (MECL) which is the minimum load level for the existing ambient and turbine operating conditions at which the applicable NOx and CO emission limits are met, as determined by the CEMS.

Process: 2MG Westinghouse Model 501G combustion turbine firing natural gas with maximum input rating of 3100 mmbtu/hr. NOx emissions are controlled with dry low-NOx combustion technology and SCR using aqueous ammonia injection. The minimum operating load is the Minimum Emissions Compliance Load (MECL) which is the minimum load level for the existing ambient and turbine operating conditions at which the applicable NOx and CO emission limits are met, as determined by the CEMS.

Process: 2SD is located at 2, Building TB - Westinghouse model 501G combustion turbine firing low sulfur (0.05%) distillate fuel oil with maximum input rating of 2940 mmBtu/hr. NOx emissions are controlled with water or steam injection and SCR using aqueous ammonia injection. Startup and shutdown operation, at operation loads less than 75% or the Minimum Emissions Compliance Load (MECL), as applicable.

Process: 2SG is located at 2, Building TB - Westinghouse model 501G combustion turbine firing natural gas with maximum input rating of 3100 mmBtu/hr. NOx emissions are controlled with dry low NOx combustion technology and SCR using aqueous ammonia injection. Startup and shutdown operation, at operation loads less than 75% or the Minimum Emissions Compliance Load (MECL), as applicable.

Emission unit U00003 - Emission Unit U00003 consists of a Westinghouse Model 501G combustion turbine (245MW base load at ISO conditions) with heat recovery steam generator and steam turbine

(115MW base load). The turbine employs dry low NOx technology and normally operates on natural gas. Distillate oil operation is limited to 1080 hours/yr. Steam (or water) injection is used during oil firing to reduce NOx emissions. Total heat rating is 3100 mmBtu/hr. NOx emissions from the turbines are additionally controlled by selective catalytic reduction (SCR) with ammonium hydroxide injection.

Emission unit U00003 is associated with the following emission points (EP):
00003
Process: 3BD is located at 3, Building TB - Westinghouse model 501G combustion turbine firing low sulfur (<0.05%) distillate fuel oil with maximum input rating of 2940 mmBtu/hr. NOx emissions are controlled with water/steam injection and SCR using aqueous ammonia injection. Base load operation rated at 245 MW at ISO conditions.

Process: 3BG is located at 3, Building TB - Westinghouse Model 501G combustion turbine firing natural gas with maximum input rating of 3100 mmBtu/hr. NOx emissions are controlled with dry low-NOx combustion technology and SCR using aqueous injection. Base load operation, rated at 245 MW at ISO conditions.

Process: 3MD is located at 3, Building TB - Westinghouse Model 501G combustion turbine firing low sulfur (<0.05%) distillate fuel oil with maximum input rating of 2940 mmBtu/hr. NOx emissions are controlled with water/steam injection and SCR using aqueous ammonia injection. The minimum operating load is the Minimum Emissions Compliance Load (MECL) which is the minimum load level for the existing ambient and turbine operating conditions at which the applicable NOx and CO emission limits are met, as determined by the CEMS.

Process: 3MG is located at 3, Building TB - Westinghouse Model 501G combustion turbine firing natural gas with maximum input rating of 3100 mmBtu/hr. NOx emissions are controlled with dry low-NOx combustion technology and SCR using aqueous ammonia injection. The minimum operating load is the Minimum Emissions Compliance Load (MECL) which is the minimum load level for the existing ambient and turbine operating conditions at which the applicable NOx and CO emission limits are met, as determined by the CEMS.

Process: 3SD is located at 3, Building TB - Westinghouse Model 501G combustion turbine firing low sulfur (<0.05%) distillate fuel oil with maximum input rating of 2940 mmbtu/hr. NOx emissions are controlled with water or steam injection and SCR using aqueous ammonia injection. Start-up and shut-down operation, at operation loads less than 75% or the Minimum Emissions Compliance Load (MECL), as applicable.

Process: 3SG is located at 3, Building TB - Westinghouse Model 501G combustion turbine firing natural gas with maximum input rating of 3100 mmbtu/hr. NOx emissions are controlled with dry low-NOx combustion technology and SCR using aqueous ammonia injection. Start-up and shut-down operation, at operation loads less than 75% or the Minimum Emissions Compliance Load (MECL), as applicable.

Emission unit U00005 - Diesel fired emergency generator, Caterpillar type SR4B, with 3512B-LE engine, rated at 1500kW. Maximum fuel consumption of 112.7 gallons/hr, with 500 gallon double wall tank with rupture basin. Operation is limited to 500 hr/year.

Emission unit U00005 is associated with the following emission points (EP):
00005

Process: DEG Diesel fired emergency generator, Caterpillar type SR4B, with 3512b-le engine, rated at 1500 kw. Maximum fuel consumption is 112.7 gph, with 500 gallon double wall tank with rupture basin. Maximum operation is 500 hours/year.

Emission unit U00006 - Diesel fired emergency fire pump, Detroit model JDFP-06WA, 6 cylinder, rated at 265hP, with maximum fuel consumption of 13.98 gallons/hr. Operation is limited to 500 hr/yr.

Emission unit U00006 is associated with the following emission points (EP):
00006
Process: DFP Diesel emergency fire pump, Detroit model JDFP-06WA, 6 cylinder, rated at 265 hp, with maximum fuel consumption of 13.98 gph. Maximum operation is 500 hours/year.

Emission unit U00001 - Emission unit U00001 consists of a Westinghouse Model 501G combustion turbine (245 MW base load at ISO conditions) with heat recovery steam generator and steam turbine (115 MW base load). The turbine employs dry low NOx technology and normally operates on natural gas. Distillate oil operation is limited to 1080 hrs/year. Steam (or water injection) is used during oil firing to reduce NOx emissions. Total heat rating is 3100 mmBtu/hr. NOx emissions from the turbines are additionally controlled by selective catalytic reduction (SCR) with ammonium hydroxide injection.

Emission unit U00001 is associated with the following emission points (EP):
00001
Process: 1BD is located at 1, Building TB - Westinghouse Model 501G combustion Turbine firing low sulfur (<0.05%) distillate fuel oil with a maximum input rating of 2,940 MMBtu/hr. NOx emissions are controlled with water or steam injection and SCR using aqueous ammonia injection. Base load operation, rated at 245 MW at ISO conditions.

Process: 1BG is located at 1, Building TB - Westinghouse Model 501G combustion turbine firing natural gas with maximum input rating of 3100 mmBtu/hr. Nitrogen oxide (NOx) emissions are controlled with dry low NOx combustion technology and selective catalytic reduction (SCR) using aqueous ammonia injection. Base load operation is rated at 245 MW at ISO conditions.

Process: 1MD Westinghouse Model 501G combustion turbine firing low sulfur (<0.05%) distillate fuel oil with maximum input rating of 2940 mmbtu/hr. NOx emissions are controlled with water or steam injection and SCR using aqueous ammonia injection. The minimum operating load is the Minimum Emissions Compliance Load (MECL) which is the minimum load level for the existing ambient and turbine operating conditions at which the applicable NOx and CO emission limits are met, as determined by the CEMS.

Process: 1MG Westinghouse Model 501G combustion turbine firing natural gas with maximum input rating of 3100 mmbtu/hr. NOx emissions are controlled with dry low-NOx combustion technology and SCR using aqueous ammonia injection. The minimum operating load is the Minimum Emissions Compliance Load (MECL) which is the minimum load level for the existing ambient and turbine operating conditions at which the applicable NOx and CO emission limits are met, as determined by the CEMS.

Process: 1SD Westinghouse Model 501G combustion turbine firing low sulfur (<0.05%) distillate fuel oil with maximum input rating of 2940 mmbtu/hr. NOx emissions are controlled with water or steam injection and SCR using aqueous ammonia injection. Start-up and shut-down operation, at operation loads less than

75% or the Minimum Emissions Compliance Load (MECL), as applicable.

Process: 1SG Westinghouse Model 501G combustion turbine firing natural gas with maximum input rating of 3100 mmbtu/hr. NOx emissions are controlled with dry low-NOx combustion technology and SCR using aqueous ammonia injection. Start-up and shut-down operation, at operation loads less than 75% or the Minimum Emissions Compliance Load (MECL), as applicable..

Title V/Major Source Status
ATHENS GENERATING PLANT is subject to Title V requirements. This determination is based on the following information:
This facility is major because its potential to emit exceeds the title V thresholds for major sources for nitrogen oxides, volatile organic compounds, particulate matter, and sulfur dioxide.

Program Applicability
The following chart summarizes the applicability of ATHENS GENERATING PLANT with regards to the principal air pollution
regulatory programs:

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

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - 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 231-5, 231-6) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 200.10) - 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, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - 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 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 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, 6 NYCRR 200.10) - 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 emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
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 for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. 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	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000106-99-0	1,3-BUTADIENE	183			
000075-07-0	ACETALDEHYDE	3260			
000107-02-8	ACROLEIN	522			
007664-41-7	AMMONIA		555.8		
007440-38-2	ARSENIC	105			
000071-43-2	BENZENE	1388			
007440-41-7	BERYLLIUM	3			
007440-43-9	CADMIUM	46			
000124-38-9	CARBON		5018268		

	DIOXIDE		
000630-08-0	CARBON MONOXIDE		7498.4
007440-47-3	CHROMIUM	105	
000100-41-4	ETHYLBENZENE	2607	
000050-00-0	FORMALDEHYDE	6897	
007439-92-1	LEAD	133	
007439-96-5	MANGANESE	7525	
007439-97-6	MERCURY	11	
000091-20-3	NAPHTHALENE	427	
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	44	
0NY210-00-0	OXIDES OF NITROGEN		444.8
0NY075-00-0	PARTICULATES		642.9
0NY075-00-5	PM-10		642.9
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS	540	
000075-56-9	PROPANE, 1,2-EPOXY-	2363	
007782-49-2	SELENIUM	238	
007446-09-5	SULFUR DIOXIDE		482.4
007664-93-9	SULFURIC ACID		70.3
000108-88-3	TOLUENE		5.3
0NY100-00-0	TOTAL HAP		21.1
0NY998-00-0	VOC		234.6
001330-20-7	XYLENE, M, O & P MIXT.	5216	

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: 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 B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(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 C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(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 D: **Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(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 E: **Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(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 F: **Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(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 G: **Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: **Severability - 6 NYCRR Part 201-6.4(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 I: **Permit Shield - 6 NYCRR Part 201-6.4(g)**
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

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

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

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

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(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 2 01-6.7 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 K: 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 L: 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: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;
(3) During the period of the emergency the facility owner 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 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 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_02

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

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

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	99	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.21	46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83	Prevention of Significant Deterioration
FACILITY	40CFR 60-GG.334(b)	84	Monitoring of Operations: CEMS
FACILITY	40CFR 60-GG.334(c)	85	CEMS for turbines without water or steam injection
FACILITY	40CFR 60-GG.334(h)(3)	86	Allowance not to monitor sulfur or nitrogen for natural gas
FACILITY	40CFR 60-GG.334(j)	87	Reporting Requirements
FACILITY	40CFR 63-ZZZZ.6603(a)	88	Reciprocating Internal Combustion Engine (RICE) NESHAP - requirements for existing engines at area sources of HAP emissions
FACILITY	40CFR 68	18	Chemical accident prevention provisions
FACILITY	40CFR 72-A.9	89	Standard requirements
FACILITY	40CFR 82-F	19	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	40CFR 97-AAAAA.406	90	Transport Rule (TR) NOx Annual Trading Program Standard Requirments
FACILITY	40CFR 97-CCCCC.606	91	Transport Rule (TR) SO2 Group 1 Trading Program Standard Requirments
FACILITY	40CFR 97-GGGGG.1006	92	CSAPR NOx Ozone Season Group 3 Trading Program Standard Requirements

FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	100	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 93, 94	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	34	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)	35	Operational Flexibility
FACILITY	6NYCRR 202-1.1	17	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	101	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	36	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(d)	37	Sulfur-in-Fuel Limitation - Distillate Oil
FACILITY	6NYCRR 227-2.4(e)(2)	38	Combined cycle combustion turbines.
FACILITY	6NYCRR 231-2.5	39, 40, 41, 42, 43	Lowest achievable

			emission rate, LAER
U-00005	6NYCRR 231-2.5	95, 96	Lowest achievable emission rate, LAER
U-00006	6NYCRR 231-2.5	97, 98	Lowest achievable emission rate, LAER
FACILITY	6NYCRR 231-2.9(b)(1)	44	Offset ratio
FACILITY	6NYCRR 231-2.9(b)(2)	45	Offset ratio
U-00001	6NYCRR 251.3(b)	102	Emission limits for non-modified sources.

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.

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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)
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 201-6.4 (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 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 202-2.5
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 practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, ATHENS GENERATING PLANT has been determined to be subject to the following regulations:
40 CFR 52.21
This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions;
ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .

40 CFR 60.334 (b)
This regulation allows the owner/operator of a gas turbine to use a CEMS to monitor NOx emissions instead of monitoring fuel and water/steam usage.

40 CFR 60.334 (c)
This regulation allows the owner or operator of a gas turbine that commenced construction, reconstruction or modification after October 3, 1977, but before July 8, 2004, and which does not use steam or water injection to control NOX emissions, for purposes of determining excess emissions, use a CEMS that meets the requirements of paragraph (b) of 40 CFR 60.334.

40 CFR 60.334 (h) (3)
This regulation allows the owner or operator of a gas turbine to not monitor the fuel for sulfur or nitrogen content if the fuel meets the 40 CFR 60.331(u) definition of natural gas.

40 CFR 60.334 (j)
This regulation sets forth the reporting requirements for affected units that continuously monitor parameters or emissions or those that periodically determine the sulfur and/or nitrogen content of the fuel burned in a gas turbine.

40 CFR 63.6603 (a)
These conditions list the emission limits, operating limits, and work practices that existing engines located at an area source of HAP emissions must meet.

The engines must meet work practices, emission limits, and operating limits on carbon monoxide or formaldehyde for the specific type of engine listed in table 2d of subpart ZZZZ.

40 CFR 72.9
A designated representative of each source of air contamination affected by the acid rain program must submit a complete Acid Rain permit application (including a compliance plan) in accordance with the deadlines specified in § 72.30;

40 CFR 97.1006
40 CFR Part 97 Subpart GGGGG the NOx Ozone Season Cross State Air Pollution Rule (CSAPR) requires additional NOx reductions from power plants located in twelve (12) states beginning with the 2021 ozone season. It is designed to reduce NOx emissions during the ozone season (May - September) for large fossil fuel fired electric generating units that have a nameplate capacity of greater than 25 megawatts electrical and produce electricity for sale. The new Group 3 Trading Program would be in addition to the existing Groups 1 and 2 NOx Ozone Trading Programs. The final rule does not include ozone season NOx emission limits for non-EGUs.

40 CFR 97.406

This condition provides the general requirements for implementing EPAs Transport Rule (TR) 40 CFR Part 97, Subpart AAAAA; intended to reduce the interstate transport of fine particulate matter and ozone. This particular condition requires facilities to measure and report their emissions of Nitrogen Oxide (NOx) and to hold TR annual NOx allowances sufficient to cover these emissions. Commonly referred to as a budget trading program, each State has an established 'budget' of emissions that are distributed or sold to facilities, which, in turn, can only emit as much as they hold in allowances.

40 CFR 97.606
This condition provides the general requirements for implementing EPAs Transport Rule (TR) 40 CFR Part 97, Subpart CCCCC; intended to reduce the interstate transport of fine particulate matter and ozone. This particular condition requires facilities to measure and report their emissions of sulfur dioxide (SO2) annually and to hold TR annual SO2 allowances sufficient to cover these emissions. Commonly referred to as a budget trading program, each State has an established 'budget' of emissions that are distributed or sold to facilities, which, in turn, can only emit as much as they hold in allowances.

6 NYCRR 201-6.4 (f)
This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

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 225-1.2 (d)
This subdivision sets the sulfur-in-fuel limitation for distillate oil fired emission sources throughout the State.

6 NYCRR 227-2.4 (e) (2)
Presumptive NOx RACT emission limits for combined cycle combustion turbines.

6 NYCRR 231-2.5
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 contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

Emission controls equivalent to the lowest achievable emission rate (LAER) must be implemented for each contaminant for which Subpart 231-2 is applicable for a given source project or new major facility. LAER is defined as the most stringent emission limitation achieved in practice or which can be expected to be achieved in practice for a category of emission sources taking into consideration each air contaminant which must be controlled (6 NYCRR 200.1(ak)).

6 NYCRR 231-2.9 (b) (1)
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 contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The project emission potential for a proposed source project must be offset with emission reduction credits created or obtained pursuant to 6 NYCRR 231-2.6 or obtained from a state in which New York State has a reciprocal trading agreement in place. The offset ratios for NOx and VOCs are set forth in section 231-2.12.

6 NYCRR 231-2.9 (b) (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 the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The project emission potential for a proposed source project must be offset with emission reduction credits created or obtained pursuant to 6 NYCRR 231-2.6 or obtained from a state in which New York State has a reciprocal trading agreement in place. The offset ratios for carbon monoxide and PM-10 are set forth in section 231-2.13.

6 NYCRR 251.3 (b)
Emission limits for non-modified sources.

Compliance Certification
Summary of monitoring activities at ATHENS GENERATING PLANT:

Location	Cond No.	Type of Monitoring

Facility/EU/EP/Process/ES

FACILITY	46	intermittent emission testing
FACILITY	47	intermittent emission testing
FACILITY	48	intermittent emission testing
FACILITY	49	intermittent emission testing
FACILITY	50	intermittent emission testing
FACILITY	51	intermittent emission testing
FACILITY	52	intermittent emission testing
FACILITY	53	work practice involving specific operations
FACILITY	54	continuous emission monitoring (cem)
FACILITY	55	work practice involving specific operations
FACILITY	56	work practice involving specific operations
FACILITY	57	record keeping/maintenance procedures
FACILITY	58	intermittent emission testing
FACILITY	59	intermittent emission testing
FACILITY	60	intermittent emission testing
FACILITY	61	continuous emission monitoring (cem)
FACILITY	62	continuous emission monitoring (cem)
FACILITY	63	continuous emission monitoring (cem)
FACILITY	64	continuous emission monitoring (cem)
FACILITY	65	continuous emission monitoring (cem)
FACILITY	66	continuous emission monitoring (cem)
FACILITY	67	record keeping/maintenance procedures
FACILITY	68	intermittent emission testing
FACILITY	69	continuous emission monitoring (cem)
FACILITY	70	intermittent emission testing
FACILITY	71	intermittent emission testing
FACILITY	72	monitoring of process or control device parameters as surrogate
FACILITY	73	intermittent emission testing
FACILITY	74	intermittent emission testing
FACILITY	75	intermittent emission testing
FACILITY	76	intermittent emission testing
FACILITY	77	continuous emission monitoring (cem)
FACILITY	78	continuous emission monitoring (cem)
FACILITY	79	continuous emission monitoring (cem)
FACILITY	80	continuous emission monitoring (cem)
FACILITY	81	continuous emission monitoring (cem)
FACILITY	82	continuous emission monitoring (cem)
FACILITY	83	continuous emission monitoring (cem)
FACILITY	85	record keeping/maintenance procedures
FACILITY	86	work practice involving specific operations
FACILITY	87	record keeping/maintenance procedures
FACILITY	88	record keeping/maintenance procedures
FACILITY	89	record keeping/maintenance procedures
FACILITY	90	record keeping/maintenance procedures
FACILITY	91	record keeping/maintenance procedures
FACILITY	92	record keeping/maintenance procedures
FACILITY	21	record keeping/maintenance procedures
FACILITY	22	record keeping/maintenance procedures
FACILITY	23	monitoring of process or control device parameters as surrogate
FACILITY	24	intermittent emission testing
FACILITY	25	intermittent emission testing
FACILITY	26	continuous emission monitoring (cem)
FACILITY	27	continuous emission monitoring (cem)
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters

		as surrogate
FACILITY	31	continuous emission monitoring (cem)
FACILITY	32	continuous emission monitoring (cem)
FACILITY	33	monitoring of process or control device parameters as surrogate
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	37	work practice involving specific operations
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	intermittent emission testing
FACILITY	40	intermittent emission testing
FACILITY	41	intermittent emission testing
FACILITY	42	intermittent emission testing
FACILITY	43	intermittent emission testing
U-00005	95	intermittent emission testing
U-00005	96	intermittent emission testing
U-00006	97	intermittent emission testing
U-00006	98	intermittent emission testing
FACILITY	44	record keeping/maintenance procedures
FACILITY	45	record keeping/maintenance procedures
U-00001	102	continuous emission monitoring (cem)

Basis for Monitoring
This facility is an electrical generating facility which makes its operations subject to the monitoring provisions as stated in 40 CFR Part 75. This requires the facility to continuously monitor NOx, carbon monoxide, and ammonia slip in order to demonstrate compliance with the PSD limits.

6 NYCRR Part 227-2, NOx RACT: The combustion turbines and duct burners in this permit are subject to LAER requirements for NOx which are more stringent than the applicable NOx RACT requirements. Further, the LAER conditions currently in the permit require the facility to install, maintain, and operate NOx CEMS in accordance with 40 CFR Part 75. Accordingly, the Department has streamlined this permit to include only the the more stringent LAER conditions for NOx emissions. By complying with these requirements the facility is also complying with the applicable provisions of NOx RACT.

40 CFR Part 60, Subpart KKKK - Standards of Performance for Stationary Combustion Turbines - Although there are some conditions with NOx and SO2 limits with regards to subpart KKKK, many of the requirements on subpart KKKK are less stringent than the corresponding requirements that LAER imposes. The LAER conditions currently in the permit already require the facility to install, maintain, and operate NOx and SO2 CEMS in accordance with Part 75. Accordingly, the Department has streamlined this permit to include mostly the more stringent LAER conditions for NOx and SO2 emissions. By complying with these requirements the facility is also complying with the applicable provisions of Subpart KKKK.

40 CFR Part 60 Subpart TTTT - Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units - This rule doesn't apply to this facility because this facility was built prior to January 8, 2014 and has not reconstructed or modified to an extant that would make the facility subject to this regulation.