

**Division of Air Resources
Permit Review Report**

Permit ID: 5-0942-00106/00018

Renewal Number: 4

08/16/2021

Facility Identification Data

Name: SARANAC POWER PARTNERS COGENERATION FAC

Address: 99 WEED ST

PLATTSBURGH, NY 12901

Owner/Firm

Name: SARANAC POWER PARTNERS LP

Address: 1111 S 103RD ST

OMAHA, NE 68124-1000, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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RAY BROOK, NY 12977-0296

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Division of Air Resources:

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Air Permitting Facility Owner Contact:

Name: John Gokey

Address: 99 Weed St

Plattsburgh, NY 12901

Phone:5185631072

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 a renewal of the Title V Permit.

Attainment Status

SARANAC POWER PARTNERS COGENERATION FAC is located in the town of PLATTSBURGH in the county of CLINTON.

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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*	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:

Permit Structure and Description of Operations

The Title V permit for SARANAC POWER PARTNERS COGENERATION FAC 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.

SARANAC POWER PARTNERS COGENERATION FAC is defined by the following emission unit(s):

Emission unit U00002 - This emission unit consists of one emission point (EP #00002). Gas turbine #2 (ES 00GT2) and duct burner #2 (ES 00DB2) exhaust out of building B1's east stack (EP #00002). A selective catalytic reduction unit (ES 0SCR2) and a catalytic oxidation device (ES 0COC2) control emissions of NOx, CO and VOC from the gas turbine/duct burner exhaust. The duct burner is only

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operated when the gas turbine is operating and both units fire natural gas only.

Emission unit U00002 is associated with the following emission points (EP):
00002

Process: GD2 is located at GROUND, Building B1 - GE Frame 7 gas turbine/hrsg unit with supplemental firing of duct burner. Both units fire natural gas.

Process: GT2 is located at GROUND, Building B1 - GE Frame 7 gas turbine/hrsg unit with no supplemental firing of duct burner. Fuel used is natural gas.

Emission unit U00003 - This emission unit is a D-tube boiler. The boiler burns natural gas. Steam from the boiler is sent to Georgia-Pacific.

Emission unit U00003 is associated with the following emission points (EP):
00003

Process: AXN is located at GROUND, Building B2 - Auxiliary boiler burns natural gas to generate steam for Georgia-Pacific.

Emission unit U00004 - This emission unit is a 1500 kw standby generator that burn natural gas. This generator generates electricity for use in building B2 when the usual source of power is unavailable.

Process: 1NG is located at GROUND, Building B2 - 1500 kw standby generator which burns natural gas to provide electricity to building B2 when the usual source of power is unavailable.

Emission unit U00001 - This emission unit consists of one emission point (EP #00001). Gas turbine #1 (ES 00GT1), duct burner #1 (ES 00DB1), standby generator (ES G102), emergency generator (G103) and maintenance generator (G104) all exhaust out of building B1's west stack (EP #00001). A selective catalytic reduction unit (ES 0SCR1) and a catalytic oxidation device (ES 0COC1) control emissions of NO_x, CO and VOC from the gas turbine/duct burner exhaust. The duct burner is only operated when the gas turbine is operating and both units fire natural gas only. The standby generator fires natural gas. The emergency and maintenance generators fire diesel fuel only.

Emission unit U00001 is associated with the following emission points (EP):
00001

Process: 2NG is located at GROUND, Building B1 - 1500 kw standby generator which burns natural gas to provide electricity to building B1 during gas turbine startups and shutdowns, and when the usual source of power is unavailable.

Process: 3DG is located at GROUND, Building B1 - 1500 kw emergency diesel generator that generates electricity for use in building B1 during gas turbine startups and shutdowns, and when the usual source of power is unavailable. This generator burns distillate fuel oil #2.

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Process: 4DG is located at GROUND, Building B1 - 400 kw maintenance generator burns #2 distillate fuel oil. Provides electrical power to building B1 during gas turbine shutdowns and startups, and when the usual source of power is unavailable.

Process: GD1 is located at GROUND, Building B1 - GE Frame 7 gas turbine/hrsg unit with supplemental firing of duct burner. Both units fire natural gas.

Process: GT1 is located at GROUND, Building B1 - GE Frame 7 gas turbine/hrsg unit with no supplemental firing of duct burner. Fuel used is natural gas.

Title V/Major Source Status

SARANAC POWER PARTNERS COGENERATION FAC is subject to Title V requirements. This determination is based on the following information:

The facility is a potentially major source of Nitrogen Oxides emissions, Particulate (less than 10 microns - PM 10) emissions and Greenhouse Gas emissions. It is also potentially major for emissions of Carbon Monoxide and Volatile Organic Compounds (VOCs) but actual emissions of these contaminants have never reached those levels.

Program Applicability

The following chart summarizes the applicability of SARANAC POWER PARTNERS COGENERATION FAC 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

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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

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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
4931	ELEC & OTHER SERVICES COMBINED

SCC Codes

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

SCC Code	Description
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
2-02-001-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Reciprocating
2-02-002-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS Reciprocating
2-02-002-03	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS Turbine: Cogeneration

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
007664-41-7	AMMONIA	800000			

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000124-38-9	CARBON DIOXIDE		1740787
000630-08-0	CARBON MONOXIDE	436248	
000050-00-0	FORMALDEHYDE		519
000110-54-3	HEXANE		1078
000074-82-8	METHANE		3532
0NY210-00-0	OXIDES OF NITROGEN	1186980	
0NY075-00-0	PARTICULATES	100139	
0NY075-02-5	PM 2.5		7645
0NY075-00-5	PM-10	50487	
007446-09-5	SULFUR DIOXIDE	17082	
000108-88-3	TOLUENE		96
0NY100-00-0	TOTAL HAP		1811
0NY998-00-0	VOC	45406	

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

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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

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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

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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

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FACILITY	ECL 19-0301	83		Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.21	33		Prevention of Significant Deterioration
FACILITY	40CFR 52-A.21 (j)	34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48		Best Available Control Technology
U-00003/00003	40CFR 52-A.21 (j) (2)	73, 74, 75, 76, 77, 78, 79, 80, 81, 82		Best Available Control Technology (BACT) (see narrative)
FACILITY	40CFR 60-A.11 (d)	52		General provisions - compliance with standards and maintenance requirements
FACILITY	40CFR 60-A.12	53		General provisions - Circumvention
FACILITY	40CFR 60-A.13	54		General provisions - Monitoring requirements
FACILITY	40CFR 60-A.4	49		General provisions - Address
FACILITY	40CFR 60-A.7 (b)	50		Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (f)	51		Notification and Recordkeeping
FACILITY	40CFR 60-Da.43a (b) (2)	55		Standard for Sulfur Dioxide for liquid or gaseous fuels
FACILITY	40CFR 60-Da.48a	56		Compliance Determinations, Procedures, and Methods.
FACILITY	40CFR 60-Da.51a (b)	57		Reporting Requirements
U-00003	40CFR 60-Db.48b (b)	68		Emission Monitoring for Particulate Matter and Nitrogen Oxides.
U-00003	40CFR 60-Db.48b (f)	69		Emission Monitoring for Particulate Matter and Nitrogen Oxides.
U-00003	40CFR 60-Db.49b (d)	70		Reporting and Recordkeeping Requirements.
U-00003	40CFR 60-Db.49b (g)	71		Reporting and Recordkeeping Requirements.
U-00003	40CFR 60-Db.49b (i)	72		Reporting and Recordkeeping Requirements.
FACILITY	40CFR 60-GG.334 (c)	58		CEMS for turbines without water or steam injection
FACILITY	40CFR 60-GG.334 (h)	59		Fuel Content
FACILITY	40CFR 63-ZZZZ.6600	60		National Emissions Standards for Hazardous Air

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FACILITY	40CFR 63-ZZZZ.6605 (b)	61	Pollutants for Stationary Reciprocating Internal Combustion Engines Reciprocating Internal Combustion Engine (RICE) NESHAP - operate and maintain air pollution control and monitoring equipment
FACILITY	40CFR 68	18	Chemical accident prevention provisions IPP no longer exempt.
FACILITY	40CFR 72- A.6(a) (3) (vi)	62	
FACILITY	40CFR 82-F	19	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	40CFR 97-AAAAA.406	63	Transport Rule (TR) NOx Annual Trading Program Standard Requirments
FACILITY	40CFR 97-CCCCC.606	64	Transport Rule (TR) SO2 Group 1 Trading Program Standard Requirments
FACILITY	40CFR 98	65	Mandatory Greenhouse Gas Reporting
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	84	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, 66, 67	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 -

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FACILITY	6NYCRR 201-6.4 (d) (4)	26	Deviations and Noncompliance Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f) (2)	27	Operational Flexibility - Protocol
FACILITY	6NYCRR 201-6.4 (g)	28	Permit Shield
FACILITY	6NYCRR 201-6.5 (a)	85	State Enforceable Requirements
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 211.2	29	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2 (d)	30	Sulfur-in-Fuel Limitation - Distillate Oil
FACILITY	6NYCRR 227-1.3 (a)	31	Particulate Emission Standards
FACILITY	6NYCRR 227-2.6 (b)	32	CEMS requirements
FACILITY	6NYCRR 242-1.5	86, 87, 88	CO2 Budget Trading Program - Standard requirements
FACILITY	6NYCRR 251.3 (b)	89	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.

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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,

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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 201-6.4 (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.

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

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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 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

In addition to Title V, SARANAC POWER PARTNERS COGENERATION FAC 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 52.21 (j)

BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a BACT determination will have to be entered into the special permit conditions, separately by the permit reviewer.

40 CFR 52.21 (j) (2)

BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a BACT determination will have to be entered into the **special** permit conditions, separately by the permit reviewer.

40 CFR 60.11 (d)

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

40 CFR 60.12

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

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40 CFR 60.13

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

40 CFR 60.334 (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)

This regulation requires the applicant to monitor the sulfur and nitrogen content of the fuel being burned in the turbine.

40 CFR 60.4

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

40 CFR 60.43a (b) (2)

This regulation requires the owner or operator of the emission source to limit the emissions of sulfur dioxide to less than 0.20 lb/mmBtu when firing gaseous or liquid fuels.

40 CFR 60.48a

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

40 CFR 60.48b (b)

This regulation requires the owner or operator of the facility to install and operate a continuous emissions monitor to monitor emissions of oxides of nitrogen from the facility.

40 CFR 60.48b (f)

This regulation requires that standby methods of obtaining minimum emissions data for oxides of nitrogen be specified by the source owner or operator.

40 CFR 60.49b (d)

This subdivision requires reporting and recordkeeping for affected steam generating units - annual fuel capacity factors.

40 CFR 60.49b (g)

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This subdivision requires reporting and recordkeeping for affected steam generating units - specific oxides of nitrogen requirements.

40 CFR 60.49b (i)

This subdivision specifies that the facility submit reports on oxides of nitrogen emissions in accordance with the required recordkeeping provisions of 40 CFR 60.49b(g).

40 CFR 60.51a (b)

This citation states reporting requirements for sulfur dioxide and oxides of nitrogen.

40 CFR 60.7 (b)

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

40 CFR 60.7 (f)

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

40 CFR 63.6600

This regulation requires the owner or operator of a new, or reconstructed spark ignition 4 stroke rich burn (4SRB) stationary RICE located at a major source of HAP emissions, to comply with the emission limitations in Table 1a and the operating limitations in Table 1b of Subpart ZZZZ.

40 CFR 63.6605 (b)

This condition requires the facility to operate their engine(s) so that emissions of hazardous air pollutants are minimized during periods when the engine(s) are starting up, shutting down, and malfunctioning.

40 CFR 72.6 (a) (3) (vi)

Was an exempt IPP under 40 CFR 72.6(b)(6) but, at any time after the later of November 15, 1990 or the date the facility commences commercial operation, fails to meet the definition of independent power production facility.

(b)(6) An independent power production facility that:

- (i) Has, as of November 15, 1990, one or more qualifying power purchase commitments to sell at least 15 percent of its total planned net output capacity; and
- (ii) Consists of one or more units designated by the owner or operator with total installed net output capacity not exceeding 130 percent of its total planned net output capacity. If the emission rates of the units are not the same, the Administrator may exercise discretion to designate which units are exempt.

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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 (NO_x) and to hold TR annual NO_x 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.

40 CFR Part 98

40 CFR Part 98 sets forth the reporting requirements for facilities that are subject to the mandatory reporting of greenhouse gases.

6 NYCRR 201-6.4 (f) (2)

This section describes the requirements for operational flexibility protocols included in Title V permits. The facility owner or operator may make certain changes to the facility that have been reviewed and approved pursuant to the protocol without first obtaining a permit modification for those changes.

6 NYCRR 201-6.5 (a)

This subdivision states that the Department shall include state enforceable conditions in Title V permits. State enforceable conditions related to regulations developed pursuant to the Climate Leadership and Community Protection Act (CLCPA) and Article 75 of New York State Environmental Conservation Law may be included in future versions of this permit, as applicable.

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 227-1.3 (a)

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This subdivision sets the particulate matter emission standards for subject stationary combustion installations.

6 NYCRR 227-2.6 (b)

Any owner or operator of a combustion source subject to reasonably available control technology (RACT) requirements, under this subdivision, for NOx and either is required or opts to employ a continuous emissions monitoring system (CEMS) must:

- 1) Submit a CEMS monitoring plan for approval by the Department,
- 2) Submit a CEMS certification protocol,
- 3) Meet CEMS monitoring requirements as detailed in this paragraph of this subdivision, and
- 4) Meet CEMS recordkeeping and reporting requirements as detailed in this paragraph of this subdivision.

6 NYCRR 242-1.5

His regulation requires that the facility hold enough carbon dioxide allowances in their carbon dioxide budget at least equal to the amount of carbon dioxide emitted from the facility each year.

6 NYCRR 251.3 (b)

Emission limits for non-modified sources.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	6 NYCRR 227-2.4 (f)	Stationary internal combustion engines.

Reason: The generators at Saranac Power are used only for emergency power and are limited to less than 500 hours of operation per year. In accordance with 227-2.4(f) (6), this makes them exempt from the control requirements of 227-2.4(f).

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(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

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enforcement action.

Compliance Certification

Summary of monitoring activities at SARANAC POWER PARTNERS COGENERATION FAC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	33	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	intermittent emission testing
FACILITY	37	intermittent emission testing
FACILITY	38	intermittent emission testing
FACILITY	39	intermittent emission testing
FACILITY	40	intermittent emission testing
FACILITY	41	intermittent emission testing
FACILITY	42	continuous emission monitoring (cem)
FACILITY	43	intermittent emission testing
FACILITY	44	continuous emission monitoring (cem)
FACILITY	45	continuous emission monitoring (cem)
FACILITY	46	continuous emission monitoring (cem)
FACILITY	47	continuous emission monitoring (cem)
FACILITY	48	continuous emission monitoring (cem)
U-00003/00003	73	intermittent emission testing
U-00003/00003	74	continuous emission monitoring (cem)
U-00003/00003	75	continuous emission monitoring (cem)
U-00003/00003	76	continuous emission monitoring (cem)
U-00003/00003	77	continuous emission monitoring (cem)
U-00003/00003	78	intermittent emission testing
U-00003/00003	79	intermittent emission testing
U-00003/00003	80	intermittent emission testing
U-00003/00003	81	intermittent emission testing
U-00003/00003	82	intermittent emission testing
FACILITY	55	record keeping/maintenance procedures
FACILITY	56	continuous emission monitoring (cem)
FACILITY	57	record keeping/maintenance procedures
U-00003	70	record keeping/maintenance procedures
U-00003	71	record keeping/maintenance procedures
U-00003	72	record keeping/maintenance procedures
FACILITY	58	continuous emission monitoring (cem)
FACILITY	59	work practice involving specific operations
FACILITY	60	record keeping/maintenance procedures
FACILITY	61	record keeping/maintenance procedures
FACILITY	62	record keeping/maintenance procedures
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
FACILITY	21	record keeping/maintenance procedures
FACILITY	22	continuous emission monitoring (cem)
FACILITY	23	continuous emission monitoring (cem)
FACILITY	24	continuous emission monitoring (cem)
FACILITY	25	continuous emission monitoring (cem)
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	27	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	30	work practice involving specific operations
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	record keeping/maintenance procedures

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FACILITY	87	record keeping/maintenance procedures
FACILITY	88	record keeping/maintenance procedures
FACILITY	89	monitoring of process or control device parameters as surrogate

Basis for Monitoring

Continuous emissions monitors (CEMs) are used to measure and record emissions of nitrogen oxides and carbon monoxide. Best available control technology (BACT) emission limits are established for each process. This includes concentration limits for the auxiliary boiler and for the turbines (with or without duct burners) and pounds per hour limits for the auxiliary boiler and for the and turbines with duct burners operating. There are also continuous emissions monitors for ammonia emissions from the turbines. Quarterly reports are submitted which document instances (if any) where emissions exceed permit limits and when the CEMs are not operating.

The permit incorporates requirements of the Cross State Air Pollution Rule. This program is designed to mitigate the interstate transport of ozone and nitrogen oxides (NOx) and imposes strict control on the NOx monitoring system including reporting both to EPA and DEC. It also requires the facility to own emission allowances to cover the amount of NOx emitted.

Sulfur dioxide emissions are controlled by restricting the facility to low sulfur content oil and by quarterly monitoring of sulfur content of the natural gas supply.

Best available control technology (BACT) emission limits are established for emissions of filterable particulates and small particulates (PM-10) This includes concentration limits and pounds per hour limits for the auxiliary boiler and for the and turbines with duct burners operating. Stack testing is required once per permit term to demonstrate compliance with these limits.

Best available control technology (BACT) emission limits are established for emissions of volatile organic compounds (VOCs). This includes concentration limits and pounds per hour limits for the auxiliary boiler and for the and turbines with duct burners operating. Stack testing may be required at the discretion of the permitting authority to demonstrate compliance with these limits. Compliance with the carbon monoxide limits, which are monitored continuously, are a strong indicator that VOC emissions are within limits. Testing has been done in the past and measured VOCs at very low levels.

Best available control technology (BACT) emission limits are established for emissions of particulates, PM-10, NOx, Carbon Monoxide and VOCs from the facility's emergency generators. This includes concentration limits and pounds per hour limits. Stack testing is required at the discretion of the permitting authority. Because the generators are only used on an emergency basis or for testing/maintenance, they operate only a few hours per month. It is not anticipated that stack testing will be required unless the situation changes significantly.

This renewal does not increase potential greenhouse gas emissions. As such, it is compliant with the Climate Leadership and Community Protection Act.