

**Division of Air Resources
Permit Review Report**

Permit ID: 6-2260-00024/00007

Renewal Number: 3

08/27/2020

Facility Identification Data

Name: CARTHAGE ENERGY COGEN FACILITY

Address: 701 W END AVE

CARTHAGE, NY 13619

Owner/Firm

Name: CARTHAGE ENERGY LLC

Address: 701 WEST END AVE

CARTHAGE, NY 13619, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: THOMAS G VOSS

Address: NYSDEC - REGION 6

317 WASHINGTON ST

WATERTOWN, NY 13601-3787

Phone:

Division of Air Resources:

Name: ROBERT A JACOBS

Address: NYSDEC - REGION 6

317 WASHINGTON ST

WATERTOWN, NY 13601

Phone:3157852513

Air Permitting Facility Owner Contact:

Name: GREG SHARLAND

Address: OGDENSBURG ENERGY FACILITY

PO BOX 585

OGDENSBURG, NY 13669

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 project consists of the renewal of the Title V permit issued to the Carthage Energy Cogen Facility.

Attainment Status

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CARTHAGE ENERGY COGEN FACILITY is located in the town of WILNA in the county of JEFFERSON.

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:

THIS FACILITY PROVIDES ELECTRICITY TO THE NEW YORK INDEPENDENT SYSTEM OPERATOR. THE COMBINED CYCLE COGENERATION FACILITY CONSISTS OF A THOMASSEN FRAME 6 GAS TURBINE WITH AN OPERATING CAPACITY OF 500MMBTU/HR, A DELTAK HEAT RECOVERY STEAM GENERATOR WITH COEN DUCT BURNERS, 83 MMBTU/HR, AND A SHIN NIPPON STEAM TURBINE. ALSO LOCATED AT THIS FACILITY ARE A STARTING 700 HP DIESEL ENGINE USED FOR STARTING THE GAS TURBINE, AN EMERGENCY DIESEL GENERATOR (EXEMPT EMISSION SOURCE), AN EMERGENCY DIESEL FIRE PUMP (EXEMPT EMISSION SOURCE), A BUILDING HEATING BOILER (EXEMPT EMISSION SOURCE), A NATURAL GAS FIRED SPACE HEATER (EXEMPT EMISSION SOURCE), AND SUPPORTING EQUIPMENT.

Permit Structure and Description of Operations

The Title V permit for CARTHAGE ENERGY COGEN FACILITY 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:

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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.

CARTHAGE ENERGY COGEN FACILITY is defined by the following emission unit(s):

Emission unit U00001 - GAS TURBINE WITH STEAM INJECTION, HEAT RECOVERY STEAM GENERATOR WITH DUCT BURNERS FOR COGENERATION OF ELECTRICITY AND THERMAL ENERGY.

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

Process: 101 is located at OPERATING FLOOR, Building GENBLDG - NO. 2 DISTILLATE FUEL OIL COMBUSTION IN GAS TURBINE WITHOUT SIMULTANEOUS OPERATION OF DUCT BURNER.

Process: 102 is located at OPERATING FLOOR, Building GENBLDG - NO. 2 DISTILLATE FUEL OIL COMBUSTION IN GAS TURBINE WITH SIMULTANEOUS OPERATION OF DUCT BURNER FIRING NATURAL GAS.

Process: 103 is located at OPERATING FLOOR, Building GENBLDG - NATURAL GAS COMBUSTION IN GAS TURBINE WITHOUT SIMULTANEOUS OPERATION OF DUCT BURNER.

Process: 104 is located at OPERATING FLOOR, Building GENBLDG - NATURAL GAS COMBUSTION IN GAS TURBINE AND DUCT BURNER SIMULTANEOUSLY.

Process: 105 is located at OPERATING FLOOR, Building GENBLDG - NO. 2 DISTILLATE FUEL OIL COMBUSTION IN GAS TURBINE AND DUCT BURNER SIMULTANEOUSLY.

Process: 106 is located at OPERATING FLOOR, Building GENBLDG - SIMULTANEOUS COMBUSTION OF NATURAL GAS AND NO. 2 DISTILLATE FUEL OIL IN THE GAS TURBINE WITHOUT SIMULTANEOUS OPERATION OF THE DUCT BURNER.

Process: 107 is located at OPERATING FLOOR, Building GENBLDG - SIMULTANEOUS COMBUSTION OF NATURAL GAS AND NO. 2 DISTILLATE FUEL OIL IN THE GAS TURBINE WITH SIMULTANEOUS OPERATION OF THE DUCT BURNER FIRING NATURAL GAS.

Emission unit U00002 - GAS TURBINE STARTING DIESEL ENGINE, 700 HP

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

Process: 201 is located at OPERATING FLOOR, Building GENBLDG - DISTILLATE FUEL OIL

Title V/Major Source Status

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CARTHAGE ENERGY COGEN FACILITY is subject to Title V requirements. This determination is based on the following information:

Carthage Energy exceeds the Title V major source threshold of 100 tons per year for NOx and CO.

Program Applicability

The following chart summarizes the applicability of CARTHAGE ENERGY COGEN FACILITY with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	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

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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
4931	ELEC & OTHER SERVICES COMBINED
9999	NONCLASSIFIABLE ESTABLISHMENTS

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

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2-02-001-01	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Turbine
2-02-001-03	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL) Turbine: Cogeneration
2-02-002-01	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS Turbine
2-02-002-03	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - NATURAL GAS Turbine: Cogeneration
2-02-004-01	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION LARGE BORE ENGINE Diesel

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 of 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
000075-07-0	ACETALDEHYDE	153.2			
000107-02-8	ACROLEIN	245.1			
007440-36-0	ANTIMONY	0.0001			
007440-38-2	ARSENIC	14			
000071-43-2	BENZENE	3.5			
007440-41-7	BERYLLIUM	0.4			
007440-43-9	CADMIUM	6.1			
000124-38-9	CARBON DIOXIDE	788400000			
000630-08-0	CARBON MONOXIDE	247908			
007440-47-3	CHROMIUM	14			
007440-48-4	COBALT	0.0001			
000100-41-4	ETHYLBENZENE	122.6			
000050-00-0	FORMALDEHYDE	76.6			
007439-92-1	LEAD	19.9			

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007439-96-5	MANGANESE	1007.4
007439-97-6	MERCURY	1.5
000091-20-3	NAPHTHALENE	134.1
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	5.9
0NY210-00-0	OXIDES OF NITROGEN	869430
000000-23-4	PAH, TOTAL	153.2
0NY075-00-0	PARTICULATES	146829
0NY075-00-5	PM-10	146829
007782-49-2	SELENIUM	31.9
007446-09-5	SULFUR DIOXIDE	3114
000108-88-3	TOLUENE	497.9
0NY100-00-0	TOTAL HAP	2730.6
0NY998-00-0	VOC	71499
001330-20-7	XYLENE, M, O & P MIXT.	245.1

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

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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

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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.

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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
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FACILITY	ECL 19-0301	86		Powers and Duties of the Department with respect to air pollution control
U-00001	40CFR 60-A.13	69		General provisions - Monitoring requirements
FACILITY	40CFR 60-A.4	50		General provisions - Address
FACILITY	40CFR 60-A.7 (b)	51		Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (d)	52		Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (f)	53		Notification and Recordkeeping
FACILITY	40CFR 60-A.9	54		General provisions - Availability of information
U-00001	40CFR 60-Dc.48c (g)	70		Reporting and Recordkeeping Requirements.
FACILITY	40CFR 60-Dc.48c (i)	55		Reporting and Recordkeeping Requirements.
U-00001	40CFR 60-GG.334 (b)	71		Monitoring of Operations: CEMS
U-00001	40CFR 60-GG.334 (h) (3)	72		Allowance not to monitor sulfur or nitrogen for natural gas
FACILITY	40CFR 63-ZZZZ	56		Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	19		Chemical accident prevention provisions
U-00001	40CFR 72-A.6 (a) (3) (vi)	73		IPP no longer exempt.
FACILITY	40CFR 82-F	20		Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	40CFR 97-AAAAA.406	57		Transport Rule (TR) NOx Annual Trading Program Standard Requirements
FACILITY	40CFR 97-CCCCC.606	58		Transport Rule (TR) SO2 Group 1 Trading Program Standard Requirements
FACILITY	40CFR 97-EEEEEE	59		CSAPR NOx Ozone Season
FACILITY	6NYCRR 200.6	1		Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10		Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	87		Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11		Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12		Prohibition of reintroduction of collected

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FACILITY	6NYCRR 201-3.2 (a)	13	contaminants to the air
FACILITY	6NYCRR 201-3.3 (a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	21, 22, 23, 60, 61	Trivial Activities - proof of eligibility
U-00001	6NYCRR 201-6	64, 65, 66, 67, 68	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (7)	2	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (8)	16	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Recordkeeping and Reporting of Compliance Monitoring 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)	24	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f) (6)	17	Off Permit Changes
FACILITY	6NYCRR 201-6.5 (a)	88	State Enforceable Requirements
FACILITY	6NYCRR 201-7	25, 62, 63	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18, 36, 37, 38, 39, 40, 41, 42, 43, 44	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	89	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	45	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 217-3.3	90	Exceptions.
FACILITY	6NYCRR 225-1	46	Fuel Composition and Use - Sulfur Limitations
FACILITY	6NYCRR 225-1.2	47	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 227-1.2	48	Particulate Emissions from Liquid Fuels.
FACILITY	6NYCRR 227-2.6 (b)	49	CEMS requirements
FACILITY	6NYCRR 242-1.5	91	CO2 Budget Trading Program - Standard requirements

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FACILITY

6NYCRR 242-8.5

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CO2 Budget Trading
Program -
Recordkeeping and
reporting

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

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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

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frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

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

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

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

6 NYCRR 211.2

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

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, CARTHAGE ENERGY COGEN FACILITY has been determined to be subject to the following regulations:

40 CFR 60.13

This regulation specifies how monitoring shall be performed and which methods and appendices are used

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to determine if the monitoring is adequate and in compliance with the regulated standards.

40 CFR 60.334 (b)

This regulation allows the owner/operator of a gas turbine to use a CEMS to monitor NO_x emissions instead of monitoring fuel and water/steam usage.

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 60.4

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 60.48c (g)

The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40 CFR 60.48c (i)

This regulation requires the source owner or operator to retain all records for a minimum of two years for compliance with the NSPS. This does not supercede any requirement that is more stringent, including the Title V requirement to maintain records for for a minimum of 5 years.

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 (d)

This condition specifies the required information and format for a summary report form and details when either a summary form and/or excess emissions reports are required.

40 CFR 60.7 (f)

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

40 CFR 60.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

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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.

40 CFR 97.406

This condition provides the general requirements for implementing EPA's 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 EPA's 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 63, Subpart ZZZZ

This regulation defines performance standards for stationary reciprocating internal combustion engines

40 CFR Part 97, Subpart EEEEE

40 CFR Part 97 Subpart EEEEE the NOx Ozone Season Cross State Air Pollution Rule (CSAPR) is a regional (22 state) cap and trade program 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.

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6 NYCRR 201-6.5 (a)

This section identifies state enforceable requirements for Title V permits.

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 217-3.3

This regulation states that the engine of a heavy duty vehicle can idle for more than five consecutive minutes when the heavy duty vehicle is not in motion only when:

- (a) (a) A diesel or non-diesel fueled heavy duty vehicle including a bus or truck is forced to remain motionless because of the traffic conditions over which the operator thereof has no control.
- (b) Regulations adopted by Federal, State or local agencies having jurisdiction require the maintenance of a specific temperature for passenger comfort. The idling time specified in section 217-3.2 of this Subpart may be increased, but only to the extent necessary to comply with such regulations.
- (c) A diesel or non-diesel fueled engine is being used to provide power for an auxiliary purpose, such as loading, discharging, mixing or processing cargo; controlling cargo temperature; construction; lumbering; oil or gas well servicing; farming; or when operation of the engine is required for the purpose of maintenance.
- (d) Fire, police and public utility trucks or other vehicles are performing emergency services.
- (e) Trucks owned or operated by persons engaged in mining and quarrying are used within the confines of such person's property.
- (f) A diesel fueled truck is to remain motionless for a period exceeding two hours, and during which period the ambient temperature is continuously below 25°F.
- (g) A heavy duty diesel vehicle, as defined in subdivision 217-5.1(o) of this Part, that is queued for or is undergoing a state authorized periodic or roadside diesel emissions inspection pursuant to Subpart 217-5 of this Part.
- (h) A hybrid electric vehicle, as defined in subdivision 217-5.1(r) of this Part, idling for the purpose of providing energy for battery or other form of energy storage recharging.
- (i) Heavy duty vehicles used for agricultural purposes on a farm.
- (j) Electric powered vehicles.

6 NYCRR 225-1.2

This section of the regulation establishes sulfur-in-fuel limitations for coal, residual oil, distillate oil, and waste oil.

6 NYCRR 227-1.2

Particulate emission limits for liquid fuels

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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 242-8.5

This regulation requires the CO₂ authorized account representative to comply with all applicable recordkeeping and reporting requirements in section 242-8.5, the applicable record keeping and reporting requirements under 40 CFR 75.73 and with the certification requirements of section 242-2.1(e) of this Part.

6 NYCRR Subpart 201-7

This regulation requires emission capping in facility permits which restrict or cap emissions from the facility or an emission source below one or more applicable requirements or where needed to establish an emission reduction credit as defined in 6 NYCRR Subpart 231.

6 NYCRR Subpart 225-1

This Subpart regulates the sulfur-in-fuel contents of fuel oils and solid fuels.

Compliance Certification

Summary of monitoring activities at CARTHAGE ENERGY COGEN FACILITY:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
U-00001	70	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
U-00001	72	record keeping/maintenance procedures

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FACILITY	57	record keeping/maintenance procedures
FACILITY	58	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
FACILITY	22	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
U-00001	64	work practice involving specific operations
U-00001	65	record keeping/maintenance procedures
U-00001	66	record keeping/maintenance procedures
U-00001	67	record keeping/maintenance procedures
U-00001	68	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	26	work practice involving specific operations
FACILITY	27	continuous emission monitoring (cem)
FACILITY	28	continuous emission monitoring (cem)
FACILITY	29	continuous emission monitoring (cem)
FACILITY	30	continuous emission monitoring (cem)
FACILITY	31	continuous emission monitoring (cem)
FACILITY	32	continuous emission monitoring (cem)
FACILITY	33	continuous emission monitoring (cem)
FACILITY	34	work practice involving specific operations
FACILITY	35	continuous emission monitoring (cem)
U-00001/-/101	74	continuous emission monitoring (cem)
U-00001/-/101	75	continuous emission monitoring (cem)
U-00001/-/101	76	continuous emission monitoring (cem)
U-00001/-/101	77	continuous emission monitoring (cem)
U-00001/-/103	78	continuous emission monitoring (cem)
U-00001/-/103	79	continuous emission monitoring (cem)
U-00001/-/103	80	continuous emission monitoring (cem)
U-00001/-/103	81	continuous emission monitoring (cem)
U-00001/-/103	82	continuous emission monitoring (cem)
U-00001/-/103	83	continuous emission monitoring (cem)
U-00001/-/104	84	continuous emission monitoring (cem)
U-00001/-/104	85	continuous emission monitoring (cem)
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	intermittent emission testing
FACILITY	43	intermittent emission testing
FACILITY	44	intermittent emission testing
FACILITY	7	record keeping/maintenance procedures
FACILITY	46	work practice involving specific operations
FACILITY	47	work practice involving specific operations
FACILITY	48	intermittent emission testing
FACILITY	91	record keeping/maintenance procedures
FACILITY	92	record keeping/maintenance procedures

**Basis for Monitoring
BASIS FOR MONITORING**

Condition 5 - 6 NYCRR 201-6.4 (c) (3) (ii)- This monitoring condition requires the facility to submit Semi-Annual (Calendar) reports 30 days after the end of the reporting period. The reports must notify the Department and report any deviations and incidences of noncompliance stating the probable cause of such deviations and any corrective

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actions or preventive measures taken. The report must be certified by the responsible official for the facility.

Condition 6 - 6 NYCRR 201-6.4 (e) - This monitoring condition requires the facility to submit Annual (Calendar) reports 30 days after the end of the reporting period. The report must include compliance certifications with compliance status for each term or condition of the permit, method used for determining compliance and whether compliance was continuous or intermittent.

Condition 7 - 6 NYCRR 202-2.1 - This monitoring condition requires emission statements to be submitted on or before April 15th each year for emissions of the previous calendar year.

Condition 22 – 6 NYCRR Part 201-6 - This monitoring condition requires a summary of emission limits and operating restriction of the permit to be posted in the control room of the facility and be plainly visible to the facility operator. The continuous monitoring must be included in the submitted Annual (Calendar) report to the Department.

Condition 23 – 6 NYCRR Part 201-6 - The ambient air temperature at the facility shall be continuously monitored and recorded within an accuracy of +/- 1 degree F. A Semi-Annual (Calendar) monitoring report will be submitted to the Department to verify compliance.

Condition 26 - 6 NYCRR Subpart 201-7 - This monitoring condition limits fuel oil use in the gas turbine and the duct burner to 25% of the time; 2,190 hours per year operation. Fuel usage will be monitored daily and a Semi-Annual report must be submitted to the Department 30 days after the end of the reporting period.

Condition 27 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the Carbon Monoxide emissions from the combustion turbine during steady state operation to 11.0 pounds per hour in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit.

Condition 28 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the Oxides of Nitrogen emissions from the combustion turbine/duct burner exhaust during steady state operation to 125.3 pounds per hour in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit.

Condition 29 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the Carbon Monoxide emissions from the combustion turbine/duct burner exhaust during steady state

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operation to 28.3 pounds per hour in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit.

Condition 30 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the Oxides of Nitrogen emissions from the combustion turbine/duct burner exhaust during steady state operation to 42 parts per million by volume (dry, corrected to 15% O₂) in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit.

Condition 31 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the Oxides of Nitrogen emissions from the combustion turbine/duct burner exhaust during steady state operation to 65 parts per million by volume (dry, corrected to 15% O₂) in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit.

Condition 32 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the Carbon Monoxide emissions from the combustion turbine/duct burner exhaust during steady state operation to 22.0 parts per million by volume (dry, corrected to 15% O₂) in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit.

Condition 33 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the Carbon Monoxide emissions from the combustion turbine/duct burner exhaust during steady state operation to 9.0 parts per million by volume (dry, corrected to 15% O₂) in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit.

Condition 34 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the facility's No. 1 and No. 2 fuel oil use in the gas turbine and duct burner to 10,200,000 gallons per year in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The usage will be monitored daily and a Semi-Annual (Calendar) report will be submitted to the Department 30 days after the end of the reporting period verifying compliance.

Condition 35 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the Oxides of Nitrogen emissions from the combustion turbine/duct burner exhaust during steady state operation to 136.1 pounds per hour in a 1-hour average using Continuous Emission

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Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit.

Condition 36 - 6 NYCRR Subpart 202-1.1 - This monitoring condition limits the VOC emissions to 5.0 pounds per hour over a one hour average. Emission testing is required once during the term of the permit to confirm compliance with the 5.0 pounds per hour limit.

Condition 37 - 6 NYCRR Subpart 202-1.1 - This monitoring condition limits the VOC emissions to 0.029 pounds per million Btus over a one hour average. Emission testing is required once during the term of the permit to confirm compliance with the 0.029 pounds per hour limit.

Condition 38 - 6 NYCRR Subpart 202-1.1 - This monitoring condition limits the PM-10 and Particulates emissions to 0.04 pounds per million Btus over a one hour average. Emission testing is required once during the term of the permit to confirm compliance with the 0.04 pounds per million Btus limit.

Condition 39 - 6 NYCRR Subpart 202-1.1 - This monitoring condition limits the PM-10 and Particulates emissions to 0.005 pounds per million Btus over a one hour average. Emission testing is required once during the term of the permit to confirm compliance with the 0.005 pounds per million Btus limit.

Condition 40 - 6 NYCRR Subpart 202-1.1 - This monitoring condition limits the PM-10 and Particulates emissions to 27.8 pounds per hour over a one hour average. Emission testing is required once during the term of the permit to confirm compliance with the 27.8 pounds per million Btus limit.

Condition 41 - 6 NYCRR Subpart 202-1.1 - This monitoring condition limits the VOC emissions to 15.8 pounds per hour over a one hour average. Emission testing is required once during the term of the permit to confirm compliance with the 15.8 pounds per hour limit.

Condition 42 - 6 NYCRR Subpart 202-1.1 - This monitoring condition limits the VOC emissions to 0.009 pounds per million Btus over a one hour average. Emission testing is required once during the term of the permit to confirm compliance with the 0.009 pounds per million Btus limit.

Condition 43 - 6 NYCRR Subpart 202-1.1 - This monitoring condition limits the PM-10 and Particulates emissions to 0.10 pounds million Btus over a one hour average.

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Emission testing is required once during the term of the permit to confirm compliance with the 0.10 pounds per million Btus limit.

Condition 44 - 6 NYCRR Subpart 202-1.1 - This monitoring condition limits the PM-10 and Particulates emissions to 3.0 pounds per hour over a one hour average. Emission testing is required once during the term of the permit to confirm compliance with the 3.0 pounds per million Btus limit.

Condition 46 - 6 NYCRR Subpart 225-1 - This monitoring condition limits the Sulfur content of No. 2 fuel oil burned at the facility to not exceed 0.0015 percent by weight. The No. 2 oil will be monitored per delivery and a Semi-Annual report will be submitted every 6 calendar month verifying compliance.

Condition 47 - 6 NYCRR 225-1.2 - This monitoring condition limits the facility's Number 1 and Number 2 Oil Sulfur Content to 0.0015 percent by weight. The fuel will be monitored per delivery and a quarterly monitoring report will be submitted to the Department 30 days after the end of the reporting period.

Condition 54 – 40 CFR 60.8c (i), NSPS Subpart Dc- Records must be maintained for at least 5 years for each emission statement submitted to the department and records indicating how the information submitted in the emission statement was determined.

Condition 56 - 40 CFR 97.406, Subpart AAAAA - The facility shall comply with the requirement to have a designated representative and may have an alternate designated representative as outlined in 40 CFR Part 97, Subpart AAAAA. Further, each TR NO_x annual source shall comply with the monitoring, reporting, and recordkeeping requirements of Subpart AAAAA. Emissions data determined shall be used to calculate allocations of TR NO_x annual allowances and to determine compliance with the TR NO_x annual emissions limitations and assurance provisions.

Condition 57 - 40 CFR 97.606, Subpart CCCCC - The facility shall comply with the requirement to have a designated representative and may have an alternate designated representative as outlined in 40 CFR Part 97, Subpart CCCCC. Further, each TR SO₂ group 1 source shall comply with the monitoring, reporting, and recordkeeping requirements of Subpart CCCCC. Emissions data determined shall be used to calculate allocations of TR SO₂ group 1 allowances and to determine compliance with the TR SO₂ group 1 emissions limitations and assurance provisions.

Condition 58 - 40 CFR 97, Subpart EEEEE - The facility shall comply with the requirement to have a designated representative and may have an alternate designated representative as outlined in 40 CFR Part 97, Subpart EEEEE. Further, each TR NO_x ozone season source shall comply with the monitoring, reporting, and recordkeeping requirements of Subpart EEEEE. Emissions data determined shall be used to calculate allocations of TR NO_x ozone season allowances and to determine compliance with the TR NO_x ozone season emissions limitations and assurance provisions.

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Condition 63 - 6 NYCRR Subpart 201-6 -The operation of the starting diesel engine for the gas turbine is limited to 150 hrs per year, calculated on a daily rolling basis. The facility shall monitor this practice daily and report on it semi annually.

Condition 64 - 6 NYCRR Subpart 201-6 – If either the duct burner or combustion turbine alone or together simultaneously co-fires #2 distillate oil and natural gas, the operation shall be counted as hours firing oil with a daily rolling limit of 2190 hours per year. This condition will be monitored and reported upon quarterly.

Condition 65 - 6 NYCRR Subpart 201-6 – The starting diesel shall not operate simultaneously with the gas turbine except during periods of gas turbine startup, shutdown, or malfunction. This condition shall be continuously monitored and annually reported upon.

Condition 66 - 6 NYCRR Subpart 201-6 – The gas turbine may not operate below the minimum megawatt generator output for the respective ambient temperature as shown on the graphs except during periods of startup, shutdown, or malfunction. This condition will continuously be monitored and annually reported upon.

Condition 67 - 6 NYCRR Subpart 201-6 – the type and amount of fuel burned in the gas turbine will be monitored and recorded within an accuracy of +/- 5 percent. This condition will be monitored continuously and reported upon annually.

Condition 68 – 6 NYCRR Subpart 227.2 (b) (1) – This condition requires that the facility conduct once per permit term testing for particulate emissions from stationary combustion installations firing oil. Testing will be completed to demonstrate emissions of particulates are below 0.10 pounds per million Btus. This condition will be reported upon semi annually.

Condition 70 – 40 CFR 60.48c(g) – This condition requires that the facility maintain records of the amount of fuels combusted during each calendar month. This condition is provided that the facility only burns very low sulfur fuel oil or other liquid or gaseous fuel with potential SO_x emissions of 0.32 lb/mmBtu or less. This condition will be monitored monthly and reported upon semi annually.

Condition 72 – 40 CFR 60.334(h)(3) – This condition allows the facility to elect to not monitor the total sulfur content of the gaseous fuel combusted in the turbine if the gaseous fuel is demonstrated to meet the definition of natural gas. Records are kept to demonstrate compliance.

Condition 74 – 6 NYCRR Part 201-7 – This condition is a mass emission limit for NO_x during startup. Startup is limited to 3 hours per occurrence and NO_x is limited to 290.8

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pounds per hour. This condition will be monitored by CEMS and reported upon quarterly.

Condition 75 – 6 NYCRR Part 201-7 – This condition is a mass emission limit for NO_x during Shutdown. Shutdown is limited to 2 hours per occurrence and NO_x is limited to 50 pounds per hour. This condition will be monitored by CEMS and reported upon quarterly.

Condition 76 – 6 NYCRR Part 201-7 – This condition is a mass emission limit for CO during Shutdown. Shutdown is limited to 2 hours per occurrence and CO is limited to 18 pounds per hour. This condition will be monitored by CEMS and reported upon quarterly.

Condition 77 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the Oxides of Nitrogen emissions from the combustion turbine/duct burner exhaust during steady state operation to 76.6 pounds per hour in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit. Further, NO_x mass emission limits change with ambient temperature. Please refer to reference curve based on ambient temperature and fuel.

Condition 78 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the carbon monoxide emissions from the combustion turbine/duct burner exhaust during steady state operation to 10 parts per million by volume (dry, corrected to 15% O₂) in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit.

Condition 79 – 6 NYCRR Part 201-7 – This condition is a mass emission limit for NO_x during startup. Startup is limited to 3 hours per occurrence and NO_x is limited to 206.1 pounds per hour. This condition will be monitored by CEMS and reported upon quarterly.

Condition 80 – 6 NYCRR Part 201-7 – This condition is a mass emission limit for NO_x during shutdown. Shutdown is limited to 2 hours per occurrence and NO_x is limited to 35 pounds per hour. This condition will be monitored by CEMS and reported upon quarterly.

Condition 81 – 6 NYCRR Part 201-7 – This condition is a mass emission limit for carbon monoxide during startup. Startup is limited to 3 hours per occurrence and CO is limited to 21.0 pounds per hour. This condition will be monitored by CEMS and reported upon quarterly.

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Condition 82 – 6 NYCRR Part 201-7 – This condition is a mass emission limit for Carbon Monoxide during shutdown. Shutdown is limited to 2 hours per occurrence and CO is limited to 18 pounds per hour. This condition will be monitored by CEMS and reported upon quarterly.

Condition 83 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the Oxides of Nitrogen emissions from the combustion turbine/duct burner exhaust during steady state operation to 87.4 pounds per hour in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit. Further, NOx mass emission limits change with ambient temperature. Please refer to reference curve based on ambient temperature and fuel.

Condition 84 - 6 NYCRR Subpart 201-7 - This monitoring condition limits the carbon monoxide emissions from the combustion turbine/duct burner exhaust during steady state operation to 23 parts per million by volume (dry, corrected to 15% O₂) in a 1-hour average using Continuous Emission Monitoring (CEM) in order to not be subject to (cap out of) the requirements of 40 CFR 52.21. The facility is required to submit quarterly (calendar) reports verifying compliance with the limit.