

# Chautauqua County

## Applicant:

Dunkirk Power LLC  
106 Point Dr N  
Dunkirk, NY 14048

## Facility:

Dunkirk Steam Generating Station  
106 Point Dr North  
Dunkirk, NY 14048

## Application ID:

9-0603-00021/00042

## Permit(s) Applied for:

Article 19 Air State Facility

## Project is Located:

Dunkirk, Chautauqua County

## Project Description:

The Department has prepared a draft permit, and made a tentative determination to issue an Air State Facility (ASF) permit for the NRG Dunkirk Steam Generating Station, located on the shore of Lake Erie in the City of Dunkirk in Chautauqua County.

The Dunkirk Steam Generating Station is an electric generating plant which can produce a total of 600 megawatts of electricity during maximum production. The station consists of four pulverized coal, dry-bottom, tangential-fired boilers that primarily fire subbituminous coal and fire distillate oil during startup. The boilers are currently permitted under Title V Air Permit ID 9-0603-00021/00030.

The proposed ASF permit is for Boiler 2 (Emission Unit U-00002) and Boilers 3 and 4 (Emission Unit U-00003) to allow for the capability of burning 100% natural gas in each boiler. NOTE: Boiler 1 (Emission Unit U-00001) is currently mothballed and not part of this project. The capabilities of firing coal will remain, with the intent of the

units being fired on either coal or natural gas as primary fuels. Coal firing capacities will not change. The ability to start up on natural gas will be added for both coal and natural gas as primary fuels, as well as maintaining the ability to startup with distillate oil for both natural gas and coal as primary fuels. Coal and natural gas are not intended to be fired simultaneously.

The draft permit also includes new emission unit E-XEMPT for a natural gas heater which is exempt because it is rated at less than 10 million Btu per hour heat input. Compliance with NO<sub>x</sub> RACT for the boilers will be met through a two plant (Dunkirk and Huntley) averaging plan as approved by the Department on May 14, 2013. The NO<sub>x</sub>RACT Compliance Plan for the Dunkirk Station and Huntley Station was dated December 2011 and updated May 2013. This averaging plan applies when coal or natural gas is fired.

The November 2014 NO<sub>x</sub> RACT analysis concluded that NO<sub>x</sub> RACT for burning natural gas in these coal boilers is to use good combustion controls and the existing over fired air systems. The applicant's vendors have guaranteed a NO<sub>x</sub> emission rate of 0.12 lb/mmBtu while burning natural gas and is also the NO<sub>x</sub> RACT limit for the boilers burning coal only.

A Prevention of Significant Deterioration (PSD) evaluation concluded that the only carbon monoxide (CO) will increase. The project emission potential for CO will be 79 tons per year, less than the 100 tons per year significant project threshold in 6NYCRR part 231-13.6. CO emissions will be monitored, recorded and reported annually to the Department, along with a comparison of the actual annual emissions against the projected annual emissions, per 6NYCRR 231-11.2(c).

The conditions in ASF permit will ultimately be incorporated into the Title V Air Permit renewal.

Persons wishing to inspect the subject Air State Facility files, including the application with all relevant supporting materials, the draft permit, and all other materials available to the DEC (the "permitting authority") that are relevant to this permitting decision should contact the Department representative noted in this notice. The [Draft Permit](#) may also be viewed and printed at: <http://www.dec.ny.gov/chemical/32249.html>.

[Availability of Application Documents:](#)

Filed application documents, and Department draft permits where applicable, are available for inspection during normal business hours at the address of the contact person. To ensure timely service at the time of inspection, it is recommended that an appointment be made with the contact person.

This project is subject to the Department's Environmental Justice Policy and an enhanced public participation plan has been prepared and accepted as a component of application completeness. As part of the plan, a document repository has been established near the project area that contains application and project related materials. Information on the repository location and other outreach components of the plan is available from the identified DEC contact.

#### State Environmental Quality Review (SEQR) Determination:

Project is an Unlisted Action and will not have a significant impact on the environment. A Negative Declaration is on file. A coordinated review was not performed.

SEQR Lead Agency: None Designated

#### State Historic Preservation Act (SHPA) Determination:

The proposed activity is not subject to review in accordance with SHPA. The permit type is exempt or the activity is being reviewed in accordance with federal historic preservation regulations.

#### Coastal Management:

This project is located in a Coastal Management area and is subject to the Waterfront Revitalization and Coastal Resources Act.

#### Opportunity for Public Comment:

Comments on this project must be submitted in writing to the Contact Person no later than *Mar 20, 2015*.

#### Contact:

Michael T Higgins  
NYSDEC Headquarters  
625 Broadway  
Albany, NY 12233

(518)402-9167

[DEPPermitting@dec.ny.gov](mailto:DEPPermitting@dec.ny.gov)

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**Facility:**

Dunkirk Steam Generating Station  
106 Point Dr North  
Dunkirk, NY 14048

**Application ID:**

9-0603-00021/00043

**Permit(s) Applied for:**

Article 17 Titles 7 & 8 Industrial SPDES - Surface Discharge  
Article 15 Title 15 Water Withdrawal Non-public

**Project is Located:**

Dunkirk, Chautauqua County

**Project Description:**

The applicant has applied for an initial permit for the continued withdrawal of 576 MGD (million gallons per day) of water from Lake Erie for cooling purposes and other related processes to electrical generation for the Dunkirk Steam Generating Station. The facility has been in operation since 1950. No changes in current operations are proposed. The Department has determined that the Facility is eligible for an Initial Permit under Section 15-501.9 of the Environmental Conservation Law. Initial Permits are limited to existing facilities for existing water withdrawals over 100,000GPD which were properly reported to the Department prior to February 15, 2012. Section 15-501.9 requires the Department to issue Initial Water Withdrawal Permits for the reported volume.

The Department has also received an application to renew the State Pollutant Discharge Elimination System (SPDES) permit for this facility. The Department intends to issue a permit renewal maintaining the current effluent limitations and monitoring and report requirements under the Environmental Benefit Permit Strategy (EBPS). The EBPS enables the Department to renew SPDES permits administratively. A full technical review is undertaken in sequence as determined by the EBPS permit priority ranking system, and when necessary permit modifications are initiated.

Under the State Environmental Quality Review Act, renewal of a permit is a Type II activity and, therefore, not subject to the specific environmental impact analysis requirements of that law. Additional information, i.e., current permit, fact sheet, renewal application, supporting documentation, the priority ranking fact sheet, and a description of the SPDES permit priority ranking system, may be obtained from or inspected at the NYSDEC central office in Albany.

#### Availability of Application Documents:

Filed application documents, and Department draft permits where applicable, are available for inspection during normal business hours at the address of the contact person. To ensure timely service at the time of inspection, it is recommended that an appointment be made with the contact person.

This project is subject to the Department's Environmental Justice Policy and an enhanced public participation plan has been prepared and accepted as a component of application completeness. As part of the plan, a document repository has been established near the project area that contains application and project related materials. Information on the repository location and other outreach components of the plan is available from the identified DEC contact.

#### State Environmental Quality Review (SEQR) Determination:

Project is not subject to SEQR because it is a Type II action.

SEQR Lead Agency: None Designated

#### State Historic Preservation Act (SHPA) Determination:

The proposed activity is not subject to review in accordance with SHPA. The permit type is exempt or the activity is being reviewed in accordance with federal historic preservation regulations.

**Coastal Management:**

This project is not located in a Coastal Management area and is not subject to the Waterfront Revitalization and Coastal Resources Act.

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