



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 8-2699-00126/00001  
Mod 0 Effective Date: 09/11/2015 Expiration Date: 09/10/2020

Mod 1 Effective Date: Expiration Date:

Permit Issued To: RED-ROCHESTER LLC  
640 QUAIL RIDGE DR  
WESTMONT, IL 60559

Contact: ERIC GOTTUNG  
RED-ROCHESTER LLC  
640 QUAIL RIDGE DR  
WESTMONT, IL 60559  
(630) 590-6045

Facility: RED-ROCHESTER LLC AT EASTMAN BUSINESS PARK  
EASTMAN BUSINESS PARK UTILITIES|WATER, POWER,  
WASTEWATER  
ROCHESTER, NY 14650-0001

Contact: BERNARD M NEE, JR  
RED-ROCHESTER LLC  
1200 RIDGEWAY AVENUE, SUITE 2121  
ROCHESTER, NY 14615-0001

Description:

RED-Rochester LLC Title V Facility Permit for utility operations, which include coal, oil and natural gas fired boilers producing steam and electrical power for commercial customers in Eastman Business Park. Other RED operations include wastewater treatment operations, wastewater sludge incineration, solvent based metal part cleaning operations, and emergency power generator operations. RED's operations occur in 8 buildings in Eastman Business Park, Buildings 31, 321, 371, M90, 95, 91, R16, and 96. RED's emergency generating operations occur throughout Eastman Business Park. These operations are identified in this permit by the following Emission Units (EU):

- |         |  |
|---------|--|
| E-NGINE | Stationary combustion sources (Engines)  |
| U-00008 | Kings Landing Wastewater Treatment operations and associated fugitive emissions  |
| U-00015 | Buildings 31, 321, and 371 stationary combustion installations, including package and built up boilers for generation of steam and electricity, and powerhouse conversion project. |
| U-00051 | Coal and ash handling systems, including fugitive emissions from Kodak Park South coal pile and roadway dust.  |



U-CLEAN Solvent metal parts cleaners and associated fugitive emissions.

This Permit authorizes conversion of Building 321 coal fired boiler operations to natural gas with some #2 fuel oil backup. Boilers #42, #43 and #44 are housed in building 321. The modification incorporates a final conversion scenario that includes the construction of building 371 which will house the following equipment: three new high pressure boilers rated at 370 mmbtu/hr., one new dual fuel medium pressure boiler rated at 264 mmbtu/hr. operating on natural gas or back up No. 2 fuel, and one used natural gas turbine rated at 50 megawatt with a Heat Recovery Steam Generator (HRSG) rated at 352 mmbtu/hr.

The final conversion scenario decommissions three boilers, the currently shut down 640 million BTU per hour (MBTU/hr) coal fired Boiler 41, the operating 670 MBTU/hr coal fired Boiler 42 in March 2018, and the 640 MBTU/hr coal-fired Boiler 43 in March, 2018. Boiler #44 will be converted to natural gas operation with No. 2 oil back up and is rated at 694 mmbtu/hr. on natural gas and 670 mmbtu/hr. on No. 2 oil. Four operating 98 MBTU/hr #6 fuel oil fired package boilers will be retained as limited use boilers.

This Permit includes Emission Reduction Credits (ERCs) based on 6NYCRR Part 231-10 for the final conversion scenario. Some of these ERCs are for conversion project "Netting" to avoid 6NYCRR Part 231-6 and Part 231-8 significant project thresholds.

With the conversion of the powerhouse to natural gas, RED is establishing ERCs based on the permanent shutdown of Boiler #41 (ES 321AG) in December 2013, and the proposed shutdown of Boilers #42 (ES 321AH) and Boiler #43 (ES 321AI) in March 2018. The total ERCs resulting from these shut downs are as follows: NOx: 567.6 tons per year (tpy); PM2.5: 570.7 tpy; PM10: 719.2 tpy; PM: 870.6 tpy; CO: 108.6 tpy; VOC: 18.1 tpy.

Under the powerhouse conversion project, RED will use a portion of the ERCs established to offset the potential emission increases, thereby ensuring that the net emissions remain below New Source Review thresholds. The following ERCs will be used for this project: NOx: 559.6 tpy; PM2.5: 412.3 tpy; PM10: 399.6 tpy; PM: 384.0 tpy; CO: 108.6 tpy VOC: 3.5 tpy.

This Permit also includes operating limits for the Multiple Hearth Incinerator located at Building 95 at Kings Landing Waste Water Treatment Plant. The limits reflect the testing conducted in July 2013 to demonstrate compliance with the Hazardous Waste Combustors MACT in 40 CFR 63 Subpart EEE.

This Permit also includes Part 212.10 RACT limit of 9 t/y of VOC emissions from the odor control trickling filter at Kings Landing Wastewater Treatment Plant. The Permit requires a minimum flow rate to ensure proper operation of the scrubber system. No additional VOC control options were found to be both technologically and economically feasible.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: SCOTT SHEELEY  
NYSDEC - REGION 8  
6274 E AVON-LIMA RD  
AVON, NY 14414

DEC Permit Conditions  
Mod 1/DRAFT



Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

**Item B: Permittee's Contractors to Comply with Permit**

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

**Item C: Permittee Responsible for Obtaining Other Required Permits**

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

**Item D: No Right to Trespass or Interfere with Riparian Rights**

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
  - Applications for permit renewals, modifications and transfers
  - Applications for permit renewals, modifications and transfers
  - Permit modifications, suspensions or revocations by the Department

**Facility Level**

- Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS



**DEC GENERAL CONDITIONS**

**\*\*\*\* General Provisions \*\*\*\***

**For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.**

**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

**Item 1.2:**

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

**Item 1.3:**

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**

**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

**Condition 1-1: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 1-1.1:**

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

**Item1-1.2:**

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

**Item 1-1.3**

Permits are transferrable with the approval of the department unless specifically prohibited by



the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 3: Applications for permit renewals, modifications and transfers**  
**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

**Item 3.2:**

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

**Item 3.3:**

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 4: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 8269900126**



Region 8 Headquarters  
Division of Environmental Permits  
6274 Avon-Lima Road  
Avon, NY 14414-9519  
(585) 226-2466



**New York State Department of Environmental Conservation**

Permit ID: 8-2699-00126/00001

Facility DEC ID: 8269900126



**Permit Under the Environmental Conservation Law (ECL)**

**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: RED-ROCHESTER LLC  
640 QUAIL RIDGE DR  
WESTMONT, IL 60559

Facility: RED-ROCHESTER LLC AT EASTMAN BUSINESS PARK  
EASTMAN BUSINESS PARK UTILITIES|WATER, POWER,  
WASTEWATER  
ROCHESTER, NY 14650-0001

Authorized Activity By Standard Industrial Classification Code:  
4931 - ELEC & OTHER SERVICES COMBINED

Permit Effective Date:

Permit Expiration Date:



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1-1 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 16 : Right to Inspect
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 1-2 6 NYCRR Subpart 201-6: Compliance Certification
- 1-3 6 NYCRR 212-1.1 (a) (1): Compliance Certification
- 1-4 6 NYCRR 227-1.2 (a) (1): Compliance Certification
- 1-5 6 NYCRR 227-2.4 (a) (1) (ii): Compliance Certification
- 25 : Scenario 1 Emission Reduction Credits
- 26 : Scenario 2 Emission Reduction Credits
- 1-6 6 NYCRR 231-10.1: Compliance Certification
- 1-7 6 NYCRR 231-11.2 (b): Compliance Certification
- 1-8 6 NYCRR 231-11.2 (c): Compliance Certification
- 1-9 40CFR 63.6(i)(4)(i)('A'), Subpart A: Compliance Certification
- 33 40CFR 63.6(i)(4)(i)('A'), Subpart A: Compliance Certification
- 1-10 40CFR 63, Subpart DDDDD: Compliance Certification
- 1-11 40CFR 63.7495(b), Subpart DDDDD: Compliance Certification
- 1-12 40CFR 63.7500(a)(3), Subpart DDDDD: Good air pollution control practices
- 1-13 40CFR 63.7505(c), Subpart DDDDD: Compliance Certification
- 1-14 40CFR 63.7530(a), Subpart DDDDD: Compliance Certification
- 1-15 40CFR 63.7530(b), Subpart DDDDD: Compliance Certification
- 1-16 40CFR 63.7530(c), Subpart DDDDD: Compliance Certification
- 1-17 40CFR 63.7530(d), Subpart DDDDD: Compliance Certification
- 1-18 40CFR 63.7530(e), Subpart DDDDD: Compliance Certification
- 1-19 40CFR 63.7530(h), Subpart DDDDD: Compliance Certification
- 1-20 40CFR 63.7545(e), Subpart DDDDD: Compliance Certification
- 1-21 40CFR 63.7565, Subpart DDDDD: General provisions
- 1-22 40 CFR 64.7: Compliance Certification
- 1-23 40 CFR 64.8: Compliance Certification
- 1-24 40 CFR 64.9: Compliance Certification

**Emission Unit Level**

- 39 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 40 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

**EU=U-00015**

- 1-25 6 NYCRR 201-6.4 (f): Compliance Certification
- 114 : Compliance Certification
- 1-26 6 NYCRR 225-1.2 (a): Compliance Certification
- 115 : Compliance Certification
- 1-27 6 NYCRR 225-1.2 (c): Compliance Certification
- 116 : Compliance Certification
- 1-28 6 NYCRR 225-1.2 (e): Compliance Certification
- 117 : Compliance Certification
- 1-29 6 NYCRR 225-1.2 (f): Compliance Certification
- 118 : Compliance Certification
- 1-30 6 NYCRR 225-1.2 (h): Compliance Certification
- 119 : Compliance Certification

**New York State Department of Environmental Conservation**

Permit ID: 8-2699-00126/00001

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- 1-31 6 NYCRR 225-1.4: Compliance Certification
- 1-32 6 NYCRR 225-1.4: Compliance Certification
- 120 : Compliance Certification
- 121 : Compliance Certification
- 1-33 6 NYCRR 225-1.5: Compliance Certification
- 122 : Compliance Certification
- 1-34 6 NYCRR 225-1.6 (f): Compliance Certification
- 123 : Compliance Certification
- 1-35 6 NYCRR 227-1.3 (a): Compliance Certification
- 1-36 6 NYCRR 227-1.3 (a): Compliance Certification
- 124 : Compliance Certification
- 125 : Compliance Certification
- 1-37 6 NYCRR 227-1.4 (b): Compliance Certification
- 126 : Compliance Certification
- 1-38 6 NYCRR Subpart 227-2: Compliance Certification
- 1-39 6 NYCRR Subpart 227-2: Compliance Certification
- 128 : Compliance Certification
- 129 : Compliance Certification
- 130 : Compliance Certification

**EU=U-00015**

- 1-40 6 NYCRR 227-2.4 (a) (2): Compliance Certification
- 132 : Compliance Certification
- 1-41 6 NYCRR 227-2.4 (e) (3): Compliance Certification
- 133 : Compliance Certification
- 1-42 6 NYCRR 227-2.6: Compliance Certification
- 1-43 6 NYCRR 227-2.6: Compliance Certification
- 1-44 6 NYCRR 227-2.6: Compliance Certification
- 134 : Compliance Certification
- 1-45 6 NYCRR 227-2.6 (b): Compliance Certification
- 1-46 6 NYCRR 231-6.2: Compliance Certification
- 1-47 6 NYCRR 231-6.2: Compliance Certification
- 136 : Compliance Certification
- 137 : Compliance Certification
- 138 : Compliance Certification
- 1-48 6 NYCRR 231-8.2: Compliance Certification
- 1-49 6 NYCRR 231-8.2: Compliance Certification
- 1-50 6 NYCRR 231-8.2: Compliance Certification
- 1-51 6 NYCRR 231-8.2: Compliance Certification
- 139 : Compliance Certification
- 140 : Compliance Certification
- 141 : Compliance Certification
- 142 : Compliance Certification
- 143 : Compliance Certification
- 144 : Compliance Certification
- 145 : Compliance Certification
- 146 : Compliance Certification
- 1-52 40CFR 52.21, Subpart A: Compliance Certification
- 1-53 40CFR 52.21, Subpart A: Compliance Certification
- 1-54 40CFR 60.42b(k)(2), NSPS Subpart Db: Compliance Certification
- 150 40CFR 60.42b(k)(2), NSPS Subpart Db: Compliance Certification
- 1-55 40CFR 60.49b(g), NSPS Subpart Db: Compliance Certification

**New York State Department of Environmental Conservation**

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- 154 40CFR 60.49b(g), NSPS Subpart Db: Compliance Certification
- 1-56 40CFR 60.49b(h), NSPS Subpart Db: Compliance Certification
- 155 40CFR 60.49b(h), NSPS Subpart Db: Compliance Certification
- 156 40CFR 63.7495(a), Subpart DDDDD: Compliance Certification

**EU=U-00015**

- 1-57 40CFR 63.7495(b), Subpart DDDDD: Compliance Certification
- 164 40CFR 63.7500(a)(3), Subpart DDDDD: Good air pollution control practices
- 168 40CFR 63.7505(c), Subpart DDDDD: Demonstrating Compliance
- 1-58 40CFR 63.7530(a), Subpart DDDDD: Compliance Certification
- 187 40CFR 63.7545(e), Subpart DDDDD: Notification of compliance status
- 200 40CFR 63.7565, Subpart DDDDD: General Provisions
- 1-59 40 CFR Part 64: Compliance Certification
- 1-60 40 CFR Part 64: Compliance Certification
- 1-61 40 CFR Part 64: Compliance Certification
- 201 : Compliance Certification
- 202 : Compliance Certification

**EU=U-00015,Proc=K07**

- 1-62 6 NYCRR 227-1.2 (a) (1): Compliance Certification
- 1-63 6 NYCRR 227-2.5 (c): Compliance Certification
- 1-64 6 NYCRR 227-2.5 (c): Compliance Certification
- 206 : Compliance Certification
- 1-65 40CFR 63.7500(c), Subpart DDDDD: Compliance Certification

**EU=U-00015,Proc=K13**

- 1-66 6 NYCRR 227-2.4 (a) (2): Compliance Certification

**EU=U-00015,Proc=K13,ES=321AH**

- 1-67 6 NYCRR 227-1.2 (a) (4): Compliance Certification
- 1-68 40CFR 63.7500(a)(3), Subpart DDDDD: Compliance Certification

**EU=U-00015,Proc=K13,ES=321AI**

- 1-69 6 NYCRR 227-1.2 (a) (4): Compliance Certification
- 1-70 6 NYCRR Subpart 231-10: Compliance Certification
- 211 : Compliance Certification
- 1-71 40CFR 63.7500(a)(3), Subpart DDDDD: Compliance Certification

**EU=U-00015,Proc=K14**

- 1-72 40CFR 52.21, Subpart A: Compliance Certification
- 1-73 40CFR 63.7500(a)(1), Subpart DDDDD: Compliance Certification

**EU=U-00015,Proc=K15**

- 1-74 6 NYCRR 225-1.2 (h): Compliance Certification
- 1-75 40CFR 52.21, Subpart A: Compliance Certification

**EU=U-00015,Proc=K21**

- 1-76 40CFR 60.332(a), NSPS Subpart GG: Compliance Certification

**EU=U-00015,Proc=K22**

- 1-77 40CFR 60.46b(f), NSPS Subpart Db: Compliance Certification

**New York State Department of Environmental Conservation**

Permit ID: 8-2699-00126/00001

Facility DEC ID: 8269900126



**EU=U-00015,Proc=K23**

- 1-78 6 NYCRR 227-1.3 (a): Compliance Certification
- 1-79 40CFR 63.7500(a)(1), Subpart DDDDD: Compliance Certification
- 234 40CFR 63.7500(a)(3), Subpart DDDDD: Good air pollution control practices
- 237 40CFR 63.7505(c), Subpart DDDDD: Demonstrating Compliance
- 251 40CFR 63.7545(e), Subpart DDDDD: Notification of compliance status
- 264 40CFR 63.7565, Subpart DDDDD: General provisions

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 274 ECL 19-0301: Contaminant List

**Emission Unit Level**

**EU=U-00015**

- 1-80 6 NYCRR 242-1.4 (b): Compliance Demonstration
- 1-81 6 NYCRR Part 249: Compliance Demonstration



**FEDERALLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.**

**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 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 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 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 201-6.4 (a) (3)**

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and



reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

**Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)**

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

**Item G: Property Rights - 6 NYCRR 201-6.4 (a) (6)**

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

**Item H: Severability - 6 NYCRR 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 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 201-6.4 (i)**

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

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

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

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

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

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

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.**

**[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]**

**Condition 1-1: Right to Inspect  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (a) (8)**

**Replaces Condition(s) 16**

**Item 1-1.1:**

The department or an authorized representative shall be allowed upon presentation of credentials



and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**Condition 16: Right to Inspect**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-1**

**Item 16.1:**

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

**The following conditions are subject to annual compliance certification requirements for Title V permits only.**

**Condition 21: Emission Unit Definition**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**



**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 21.1(From Mod 1):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00015

Emission Unit Description:

Building 31, 321 and 371 Stationary Combustion Installations, including package and built up boilers used for the generation of process steam and electricity. Also includes powerhouse conversion project operating scenarios.

Building(s): 031  
321  
371

**Item 21.2(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: E-NGINE

Emission Unit Description:

Facility Emission Unit for Stationary Combustion Sources (Engines)

Building(s): 091  
095  
311  
602

**Item 21.3(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00008

Emission Unit Description:

Kings Landing Wastewater Treatment Operations and Associated Fugitive Emissions

Building(s): 091  
095  
096  
R16

**Item 21.4(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00051

Emission Unit Description:

Coal and ash handling systems, including fugitive emissions from KPS coal pile and roadway dust.

Building(s): 321  
M90

**Item 21.5(From Mod 0):**

The facility is authorized to perform regulated processes under this permit for:

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Emission Unit: U-CLEAN

Emission Unit Description:

Solvent Metal Parts Cleaners and Associated Fugitive Emissions

- Building(s): 001
- 027
- 031
- 087
- 321
- 332
- 402
- 511

**Condition 1-2: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 1-2.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 1-2.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Based upon a dispersion modeling report submitted to the Department in September 2016, RED-Rochester has demonstrated that the ambient impact of the sulfur dioxide (SO2) emissions from the combustion of the following listed fuels in Boilers 44 (ES 321AJ), Package Boilers 1-4 (ES 031AC, 031AD, 031AE & 031AF), MP Boiler (ES 321BK), three HP Boilers (ES 321BL, 321BM, 321BN) and the Gas Turbine/HRSG (ES 321BA/321BE) will not exceed the 1-hour National Ambient Air Quality Standard (NAAQS) for SO2. Upon completion of the Powerhouse Conversion Project (defined herein), combustion operations in these boilers shall be limited to the fuels listed below:

ID	BOILER	ALLOWABLE FUELS FOR COMBUSTION
6A	Boiler 44	Natural gas or No. 2 Oil
	Package Boilers 1-4	No. 6 Oil
	MP Boiler	Natural gas or No. 2 Oil
	Three HP Boilers	Natural gas
	Gas turbine/HRSG	Natural gas or No. 2 Oil

In order to demonstrate compliance with this requirement,



RED-Rochester shall maintain a record of the fuels fired by each boiler in the facility operating records. Records shall be kept on site and made available to the Department upon request.

Note that compliance with this condition assures that RED will not exceed the 1-hour NAAQS for SO<sub>2</sub>. RED may operate only the emission sources noted above on the allowable fuels listed, as a means of assuring compliance with the NAAQS for SO<sub>2</sub>, on or after January 1, 2018.

Monitoring Frequency: DAILY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-3: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 212-1.1 (a) (1)**

**Item 1-3.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-3.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility is subject to 6 NYCRR Part 212. This condition is applicable to non-criteria air contaminants emitted from all process emission sources at the facility.

1. No later than 180 days after the effective date of this permit modification, the owner or operator shall submit to the Department a list of all process emission sources (that are not trivial or exempt under 6 NYCRR 201-3 or exceptions under 6 NYCRR 212-1.4) and, for each contaminant emitted from each process emission source submit the following:

- i. the actual emission rate, in pounds per hour;
- ii. the emission rate potential, as defined in 6 NYCRR 200.1, in pounds per hour;
- iii. a proposed environmental rating using the criteria detailed in 6 NYCRR 212-1.3.
- iv. any annual or short-term air dispersion modeling analysis done to predict off-site air concentrations to further support the proposed air contaminants'



environmental rating. This should include an analysis of VOC emissions, not given an A-rating in item (iii) above, that would otherwise be exempt from the Provisions of 6 NYCRR Part 212 as listed in 6 NYCRR Part 212-1.4;

v. for each High Toxicity Air Contaminant listed in 6 NYCRR 212-2.2 Table 2, the facility-wide actual emissions, in pounds per year; and

vi. supporting calculations.

2. For each HTAC with a facility-wide actual emission rate less than the corresponding mass emission limit stated in 6 NYCRR 212-2.2, Table 2, no further review is required.

3. For those contaminants with a facility-wide actual emission rate in excess of the mass emission limit stated in 6 NYCRR 212-2.2, Table 2, and for all other non-criteria air contaminants, the facility shall comply with the emission reductions specified in 6 NYCRR 212-2.3(b), Table 4, except as provided by Item 5 of this condition (regarding contaminants subject to a federal standard under 40 CFR Parts 60, 61 and 63) and Item 6 (regarding process emissions sources that are exempt).

i. For those contaminants identified in Item 1 of this condition, except those that satisfy Item 2 (HTACs with actual emissions less than the mass emission thresholds in 6 NYCRR 212-2.2 Table 2), the owner or operator shall state, for each process source with a contaminant(s) having an emission rate potential equal to or greater than 0.1 lb/hr for A-rated contaminants or 10 lb/hr for all other contaminants, whether the emission rate is compliant with 6 NYCRR 212-2.3(b), Table 4. The owner shall state the method of control and the method used to determine compliance.

ii. The contaminants identified in Item 1 of this condition with an emission rate potential from a process emission source that is less than 0.1 lb/hr for A-rated contaminants or 10 lb/hr for all other contaminants, except those that satisfy Item 2, shall not be emitted at a rate that results in a predicted ambient concentration in excess of the Annual Guideline Concentration or Short term Guideline Concentration, or any interim AGC or SGC as noted in 6 NYCRR 212-2.3(b) table 4.

4.i. For each contaminant with an emission rate potential from a process emission source greater than or equal to



0.1 lb/hr for A-rated contaminants or 10 lb/hr for all other contaminants, that does not comply with the specified degree of air cleaning in 6 NYCRR 212-2.3(b), the owner or operator shall submit to the Department, no later than 180 days after the effective date of this permit:

(a) a plan to meet the emission reduction specified in 6 NYCRR 212-2.3(b), or

(b) a toxic BACT (T-BACT) analysis, as described in 6 NYCRR 212-1.2.

ii. Not later than one year after the effective date of this permit, the owner or operator shall comply with 6 NYCRR 212-2.3(b) or install T-BACT.

5.i. A process emission source subject to a standard under 40 CFR Part 60 satisfies the requirements of this condition for the respective air contaminant if the facility demonstrates that it is in compliance with that relevant 40 CFR Part 60 standard.

ii. A process emission source subject to a standard under 40 CFR Part 61 or Part 63 satisfies the requirements of this condition for the respective air contaminant if the facility demonstrates that it is in compliance with that relevant 40 CFR Part 61 or Part 63 standard and, for those federal standards regulating HTACs, provides a Toxic Impact Assessment (TIA) demonstrating that the predicted maximum off-site ambient concentration is less than the AGC and SGC and that emissions are less than the Persistent and Bioaccumulative Trigger, if applicable, as defined in 6 NYCRR 212.

(a) A facility-wide toxic impact assessment must be completed using Department-approved modeling procedures. No later than 180 days after the effective date of this permit, the owner or operator must submit to the Department a modeling protocol prepared by a licensed Professional Engineer registered in the State of New York for the impact assessment. No later than 90 days after the Department's approval of the protocol, the owner or operator shall submit to the Department a report describing the results of this impact assessment.

(b) No later than 90 days after the Department's approval of the modeling protocol, for each contaminant for which the impact assessment predicts ambient impacts in excess of the AGC or SGC, the owner or operator shall submit to the Department a plan to reduce emissions (or otherwise reduce predicted ambient impacts) from one or more process emission sources such that predicted ambient impacts of facility-wide emissions are below the AGC and SGC.

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6. The Department assigns final Environmental Ratings to contaminants, based on the criteria in 6 NYCRR Part 212-1.3, and reserves the right to change any initial environmental rating proposed by the facility owner or operator.

7. On an annual basis, the owner or operator shall submit to the Department a report stating whether any changes were made to the operation of any process emission sources, or the air pollution control equipment, that could result in increases in emissions or increases in predicted ambient concentrations.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-4: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-1.2 (a) (1)**

**Item 1-4.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00015

Process: K12

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-4.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions from Boilers 42 and 43 (ES 321AH & 321AI) shall not exceed 0.10 lb/mmbtu while burning No.6 fuel oil. A stack test to demonstrate compliance with this limit shall be required at the Department's discretion.

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-5: Compliance Certification**



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**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-2.4 (a) (1) (ii)**

**Replaces Condition(s) 130**

**Item 1-5.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00015

Process: K24

Emission Source: 321BL

Emission Unit: U-00015

Process: K24

Emission Source: 321BM

Emission Unit: U-00015

Process: K24

Emission Source: 321BN

Regulated Contaminant(s):

CAS No: 0NY210-00-0      OXIDES OF NITROGEN

**Item 1-5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

This condition applies to natural gas only fired very large boilers. The owner or operator shall install, calibrate, maintain, and operate a CEMS for the monitoring of NO<sub>x</sub> in accordance with the requirements of this subpart.

Compliance with the emission limit will be based on a 24-hour heat input weighted average from May 1st through September 30th. Compliance with the emission limit will be based on a 30-day rolling heat input weighted average from October 1st through April 30th.

Owners or operators required to use 40 CFR Part 75 monitoring reference methods are required to do so. Any other owners or operators may use either 40 CFR Part 60 or 40 CFR Part 75 monitoring reference methods.

The owner or operator will maintain records on-site for a minimum of five years.

The compliance deadline, with the emission limitation listed in this condition, is July, 1 2014. Compliance with the monitoring, record keeping, or reporting requirements listed in this condition begins on July 1, 2014.

Manufacturer Name/Model Number: NO<sub>x</sub> Analyzer



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Upper Permit Limit: 0.08 pounds per million Btus  
Reference Test Method: See Monitoring Condition  
Monitoring Frequency: CONTINUOUS  
Averaging Method: AVERAGING METHOD - SEE MONITORING

**DESCRIPTION**

Reporting Requirements: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 3 calendar month(s).

**Condition 25: Scenario 1 Emission Reduction Credits**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 25.1:**

As part of the modification project to convert the Eastman Business Park powerhouse to natural gas, RED is establishing Emission Reduction Credits (ERCs) based on the permanent shutdown of Boiler #41 (ES 321AG) in December 2013, and the proposed shutdown of Boilers #42 (ES 321AH) in August 2017, Boiler #43 (ES 321AI) in January 2018, and Package Boilers #1-4 (ES 031AC, 031AD, 031AE, 031AF) in January 2018. The total ERCs resulting from these shut downs are as follows:

NOx: 568.7 tpy; PM2.5: 570.8 tpy; PM10: 719.4 tpy; PM: 870.9 tpy; CO: 108.8 tpy; VOC: 18.1 tpy.

Under Scenario 1 of the powerhouse conversion project, RED will use a portion of the ERCs established to offset the potential emission increases, thereby ensuring that the net emissions remain below New Source Review thresholds. The following ERCs will be used for this project:

NOx: 466.9 tpy; PM2.5: 52.8 tpy; PM10: 47.8 tpy; PM: 37.8 tpy; CO: 108.8 tpy; VOC: 2.9 tpy.

**Condition 26: Scenario 2 Emission Reduction Credits**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 26.1:**

Under Scenario 2 of the modification project to convert the Eastman Business Park powerhouse to natural gas, RED is establishing Emission Reduction Credits (ERCs) based on the permanent shutdown of Boiler #41 (ES 321AG) in December 2013; and the proposed shutdown of Boilers #42 (ES 321AH) in August 2017 and the Package Boilers #1-4 (ES 031AC, 031AD, 031AE, 031AF) in January 2018; and the proposed curtailment of Boiler #43 (ES 321AI) operation to 10% annual capacity (5.6E5 mmbtu/yr) in January 2018. The total ERCs resulting from these



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shut downs are as follows:

NOx: 512.7 tpy; PM2.5: 523.3 tpy; PM10: 662.0 tpy; PM: 803.7 tpy; CO: 103.4 tpy;  
VOC: 17.4 tpy.

Under Scenario 2 of the powerhouse conversion project, RED will use a portion of the ERCs established to offset the potential emission increases, thereby ensuring that the net emissions remain below New Source Review thresholds. The following ERCs will be used for this project: NOx: 217.4 tpy; PM2.5: 30.2 tpy; PM10: 25.2 tpy; PM: 15.2 tpy; CO: 103.4 tpy.

**Condition 1-6: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 231-10.1**

**Item 1-6.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000630-08-0	CARBON MONOXIDE
CAS No: 0NY075-00-0	PARTICULATES
CAS No: 0NY075-00-5	PM-10
CAS No: 0NY998-00-0	VOC
CAS No: 0NY075-02-5	PM 2.5
CAS No: 0NY210-00-0	OXIDES OF NITROGEN

**Item 1-6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

As part of the modification project to convert the Eastman Business Park powerhouse to natural gas, RED is establishing Emission Reduction Credits (ERCs) based on the permanent shutdown of Boiler #41 (ES 321AG) in December 2013, and the proposed shutdown of Boilers #42 (ES 321AH) in March 2018, Boiler #43 (ES 321AI) in March 2018. The total ERCs resulting from these shut downs are as follows:

NOx: 567.6 tpy; PM2.5: 570.7 tpy; PM10: 719.2 tpy; PM: 870.6 tpy; CO: 108.6 tpy; VOC: 18.1 tpy.

Under the Final Scenario of the powerhouse conversion project, RED will use a portion of the ERCs established to offset the potential emission increases, thereby ensuring that the net emissions remain below New Source Review thresholds. The following ERCs will be used for this project:

NOx: 559.6 tpy; PM2.5: 412.3 tpy; PM10: 399.6 tpy; PM: 384.0 tpy; CO: 108.6 tpy VOC: 3.5 tpy.



Parameter Monitored: OPERATING HOURS  
Upper Permit Limit: 0 hours  
Monitoring Frequency: SEMI-ANNUALLY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-7: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-11.2 (b)**

**Item 1-7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a modification where the projected actual annual emissions (rather than the potential to emit) is used to determine the project emission potential, and (1) the project emission potential which is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of Subpart 231-13 of Part 231, or (2) the project emission potential when added to emissions excluded in accordance with 231-4.1(b)(40)(i)(c) is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of Subpart 231-13, the facility owner or operator, in addition to complying with any requirements under 6 NYCRR Part 201, must maintain the following information for a minimum of five years:

- (1) A description of the modification.
- (2) An identification of each new or modified emission source(s) including the associated processes and emission unit.
- (3) The calculation of the project emission potential for each modified emission source(s) including supporting documentation.
- (4) The date the modification commenced operation.

These recordkeeping requirements apply to exempt and

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trivial activities but do not affect their exempt or trivial permitting status under 6 NYCRR Part 201-3. The facility must submit these records to the Department, upon the Department's request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-8: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-11.2 (c)**

**Item 1-8.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-8.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a modification where the projected actual emissions (rather than the potential to emit) is used to determine the project emission potential, and (1) the project emission potential is less than 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of 6 NYCRR Part 231-13, but equals or exceeds 50 percent of the applicable significant project threshold when emissions excluded in accordance with 231-4.1(b)(40)(i)(c) are added, or (2) the project emission potential equals or exceeds 50 percent of the applicable significant project threshold in Table 3, Table 4 or Table 6 of 6 NYCRR Part 231-13, the facility owner or operator must submit an application to modify the facility permit under the minor permit provisions of 6 NYCRR Part 201-6 or obtain a preconstruction permit under the provisions of Subpart 201-6, and must:

(1) maintain the following information for a minimum of five years:

(i) a description of the modification.

(ii) an identification of each new or modified emission source(s) including the associated processes and emission unit.

(iii) the calculation of the project emission potential for each modified emission source(s) including supporting documentation.



(iv) the date the modification commenced operation.

(2) monitor the emissions of each regulated NSR contaminant from the emission source(s) that will increase as a result of the modification, and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five year following resumption of regular operations after the modification, or for a period of 10 years following resumption of regular operations after the change if the modification increases the design capacity of or potential to emit the regulated NSR contaminant at such emission source(s).

(3) submit a report to the department within 30 days after the end of each year during which records must be generated in accordance with 6 NYCRR 231-11.2(c)(2). The report must contain:

(i) the name, address, and telephone number of the major facility.

(ii) the annual emissions as calculated pursuant to 6NYCRR 231-11.2(c)(2).

(iii) a comparison of actual annual emissions to the projected actual emissions and, if applicable, an explanation as to why the actual annual emissions exceeded the projected actual emissions.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-9: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.6(i)(4)(i)('A'), Subpart A**

**Replaces Condition(s) 33**

**Item 1-9.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-9.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an existing source who is unable to comply with a relevant standard established under this part pursuant to section 112(d) of the Act may request

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that the Administrator grant an extension allowing the source up to one additional year to comply with the standard, if such additional period is necessary for the installation of controls. The owner or operator of an affected source who has requested an extension of compliance under this paragraph and who is otherwise required to obtain a Title V Permit shall apply for such permit or apply to have the source's title V permit revised to incorporate the conditions of the extension of compliance. The conditions of an extension of compliance granted under this paragraph will be incorporated into the affected source's Title V permit according to the provisions of part 70 or Federal title V regulations in this chapter (42 U.S.C. 7661), whichever are applicable.

RED-Rochester has requested and received an extension of compliance from the requirements of 40 CFR 63 Subpart DDDDD from the USEPA. Per a letter from USEPA dated April 1, 2015, the compliance date for the 40 CFR 63 Subpart DDDDD requirements that are applicable to RED's existing Boilers 42, 43 and 44 (ES 321AH, ES 321AI, ES 321AJ) and existing Package Boilers #1-4 is extended until January 31, 2017. In addition, RED-Rochester is required to submit periodic reports that describe their progress in implementing the project milestones that are specified in RED-Rochester's January 8, 2015 request to EPA for extension of compliance date. The progress reports must be submitted on a quarterly basis by the following dates:

- November 15, 2016
- February 15, 2017

All progress reports should be submitted to the USEPA and NYDEC at the following addresses:

Mr. Robert Buettner, Chief  
Air Compliance Branch  
U.S. Environmental Protection Agency - Region 2  
290 Broadway - 21st Floor  
New York, New York 10007

Mr. Thomas Marriott  
Regional Air Pollution Control Engineer  
NYSDEC - Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 33: Compliance Certification**



Effective between the dates of 09/11/2015 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 63.6(i)(4)(i)(A), Subpart A

Replaced by Condition(s) 1-9

**Item 33.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 33.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an existing source who is unable to comply with a relevant standard established under this part pursuant to section 112(d) of the Act may request that the Administrator grant an extension allowing the source up to one additional year to comply with the standard, if such additional period is necessary for the installation of controls. The owner or operator of an affected source who has requested an extension of compliance under this paragraph and who is otherwise required to obtain a Title V Permit shall apply for such permit or apply to have the source's title V permit revised to incorporate the conditions of the extension of compliance. The conditions of an extension of compliance granted under this paragraph will be incorporated into the affected source's Title V permit according to the provisions of part 70 or Federal title V regulations in this chapter (42 U.S.C. 7661), whichever are applicable.

RED-Rochester has requested and received an extension of compliance from the requirements of 40 CFR 63 Subpart DDDDD from the USEPA, for their existing solid fuel boilers. The extension of compliance date letter from USEPA for RED-Rochester was dated April 1, 2015. RED's Boilers 42, 43 and 44 (ES 321AH, ES 321AI, ES 321AJ) must be in compliance with all applicable requirements of 40 CFR 63 Subpart DDDDD no later than January 31, 2017. In addition, RED-Rochester is required to submit periodic reports that describe their progress in implementing the project milestones that are specified in RED-Rochester's January 8, 2015 request to EPA for extension of compliance date. The progress reports must be submitted on a quarterly basis by the following dates:

- May 15, 2015
- August 15, 2015
- November 15, 2015
- February 15, 2016
- May 15, 2016
- August 15, 2016



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- November 15, 2016
- February 15, 2017

All progress reports should be submitted to the USEPA and NYDEC at the following addresses:

Mr. Robert Buettner, Chief  
Air Compliance Branch  
U.S. Environmental Protection Agency - Region 2  
290 Broadway - 21st Floor  
New York, New York 10007

Mr. Thomas Marriott  
Regional Air Pollution Control Engineer  
NYSDEC - Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-10: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63, Subpart DDDDD**

**Item 1-10.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY100-00-0 TOTAL HAP

**Item 1-10.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

RED shall comply with 40 CFR 63 Subpart DDDDD (NESHAP for Major Sources: Industrial, Commercial and Institutional Boilers and Process Heaters) and any associated requirements in 40 CFR Subpart A by the corresponding compliance date..

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-11: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.7495(b), Subpart DDDDD**

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**Item 1-11.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-11.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities that are major sources of hazardous air pollutants (HAPs) that have industrial, commercial or institutional boilers must comply with 40 CFR 63 Subpart DDDDD by January 31, 2016, except as provided in 40 CFR 63.6(i)(4)(i)(A) elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-12: Good air pollution control practices  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.7500(a)(3), Subpart DDDDD**

**Replaces Condition(s) 164, 234**

**Item 1-12.1:**

This Condition applies to:

Emission Unit: U00015  
Process: K12

Emission Unit: U00015  
Process: K13

Emission Unit: U00015  
Process: K14

Emission Unit: U00015  
Process: K16

Emission Unit: U00015  
Process: K23

Emission Unit: U00015  
Process: K24

**Item 1-12.2:**

At all times, the owner or operator must operate and maintain any affected source, including



associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**Condition 1-13: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.7505(c), Subpart DDDDD**

**Replaces Condition(s) 168, 237**

**Item 1-13.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00015  
Process: K14

Emission Unit: U-00015  
Process: K16

Emission Unit: U-00015  
Process: K23

Emission Unit: U-00015  
Process: K24

**Item 1-13.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an industrial, commercial, or institutional boiler located at a major source of HAP must demonstrate compliance with all applicable emission limits using performance stack testing, fuel analysis, or continuous monitoring systems (CMS), including a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS), continuous parameter monitoring system (CPMS), or particulate matter continuous parameter monitoring system (PM CPMS), where applicable. The owner or operator may demonstrate compliance with the applicable emission limit for hydrogen chloride (HCl), mercury, or total selected metals (TSM) using fuel analysis if the emission rate calculated according to 40 CFR 63.7530(c) is less than the applicable emission limit. (For gaseous fuels, the owner or operator may not use fuel analyses to comply with the TSM alternative standard or the HCl standard.) Otherwise, the owner or operator must

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demonstrate compliance for HCl, mercury, or TSM using performance testing, if subject to an applicable emission limit listed in Tables 1, 2, or 11 through 13 to subpart DDDDD.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-14: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.7530(a), Subpart DDDDD**

**Item 1-14.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-14.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility must demonstrate initial compliance with each emission limit that applies to the facility by conducting initial performance tests and fuel analyses and establishing operating limits, as applicable, according to §63.7520, paragraphs (b) and (c) of this section, and Tables 5 and 7 to this subpart. The requirement to conduct a fuel analysis is not applicable for units that burn a single type of fuel, as specified by §63.7510(a)(2)(i). If applicable, facility must also install, operate, and maintain all applicable CMS (including CEMS, COMS, and CPMS) according to §63.7525.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-15: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.7530(b), Subpart DDDDD**

**Item 1-15.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-15.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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**Monitoring Description:**

If the facility demonstrates compliance through performance testing, it must establish each site-specific operating limit in Table 4 to this subpart that applies to the facility according to the requirements in §63.7520, Table 7 to this subpart, and paragraph (b)(4) of this section, as applicable. Facility must also conduct fuel analyses according to §63.7521 and establish maximum fuel pollutant input levels according to paragraphs (b)(1) through (3) of this section, as applicable, and as specified in §63.7510(a)(2). (Note that §63.7510(a)(2) exempts certain fuels from the fuel analysis requirements.) However, if facility switches fuel(s) and cannot show that the new fuel(s) does (do) not increase the chlorine, mercury, or TSM input into the unit through the results of fuel analysis, then facility must repeat the performance test to demonstrate compliance while burning the new fuel(s).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 30 days after first semi-annual (6 month) period following Permit Issue Date

**Condition 1-16: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.7530(c), Subpart DDDDD**

**Item 1-16.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-16.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

**Monitoring Description:**

If the facility elects to demonstrate compliance with an applicable emission limit through fuel analysis, it must conduct fuel analyses according to §63.7521 and follow the procedures in paragraphs (c)(1) through (5) of this section.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-17: Compliance Certification  
Effective for entire length of Permit**



**Applicable Federal Requirement:40CFR 63.7530(d), Subpart DDDDD**

**Item 1-17.1:**

The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: U-00015	Emission Source: 321BL
Process: K24	
Emission Unit: U-00015	Emission Source: 321BM
Process: K24	
Emission Unit: U-00015	Emission Source: 321BN
Process: K24	

**Item 1-17.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If facility owns or operates an existing unit with a heat input capacity of less than 10 million Btu per hour or a unit in the unit designed to burn gas 1 subcategory, it must submit a signed statement in the Notification of Compliance Status report that indicates that the facility conducted a tune-up of the unit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-18: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.7530(e), Subpart DDDDD**

**Item 1-18.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-18.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility must include with the Notification of Compliance Status a signed certification that the energy assessment was completed according to Table 3 to this subpart and is an accurate depiction of the facility at the time of the assessment.



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-19: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.7530(h), Subpart DDDDD**

**Item 1-19.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-19.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility owns or operates a unit subject to emission limits in Tables 1 or 2 or 11 through 13 to this subpart, it must meet the work practice standard according to Table 3 of this subpart. During startup and shutdown, the facility must only follow the work practice standards according to item 5 of Table 3 of this subpart.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-20: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.7545(e), Subpart DDDDD**

**Replaces Condition(s) 187, 251**

**Item 1-20.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00015  
Process: K14

Emission Unit: U-00015  
Process: K16

Emission Unit: U-00015  
Process: K23

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**Item 1-20.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners and operators that are required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530 must submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii). For the initial compliance demonstration for each affected source, the owner or operator must submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of all performance test and/or other initial compliance demonstrations for the affected source according to 40 CFR 63.10(d)(2). The Notification of Compliance Status report must contain all the information specified in 40 CFR 63.7545(e)(1) through (8), as applicable.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-21: General provisions  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.7565, Subpart DDDDD**

**Replaces Condition(s) 264**

**Item 1-21.1:**

This Condition applies to:

Emission Unit: U00015  
Process: K23

Emission Unit: U00015  
Process: K24

**Item 1-21.2:**

Table 10 to subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the facility. The owner or operator is responsible for ensuring they comply with all General Provisions contained in Table 10.

**Condition 1-22: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:40 CFR 64.7**

**Item 1-22.1:**





The Compliance Certification activity will be performed for the Facility.

**Item 1-22.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) Commencement of operation. RED shall conduct the monitoring required under this part upon issuance of the Title V Permit.

(b) Proper maintenance. At all times, RED shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), RED shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. RED shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(d) Response to excursions or exceedances.

(1) Upon detecting an excursion or exceedance, operation of the pollutant-specific emissions unit (including the control device and associated capture system) shall be restored to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action



(such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether acceptable procedures in response to an excursion or exceedance have been followed will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(e) Documentation of need for improved monitoring. If RED identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**Condition 1-23: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40 CFR 64.8**

**Item 1-23.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-23.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Based on the results of a determination made under §64.7(d)(2), the Administrator or the permitting authority may require RED to develop and implement a Quality



improvement plan (QIP) in accordance with the requirements of §64.8.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**Condition 1-24: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:40 CFR 64.9**

**Item 1-24.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 1-24.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

RED shall submit monitoring reports to the permitting authority in accordance with 40 CFR 70.6(a)(3)(iii). A report for monitoring shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(iii) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

RED shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and

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any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**\*\*\*\* Emission Unit Level \*\*\*\***

**Condition 39: Emission Point Definition By Emission Unit**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 39.1(From Mod 1):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00015

Emission Point: 00001

Height (ft.): 366 Diameter (in.): 132  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 031

Emission Point: 00003

Height (ft.): 408 Diameter (in.): 144  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 321

Emission Point: 00004

Height (ft.): 409 Diameter (in.): 180  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 321

Emission Point: 321A0

Height (ft.): 187 Diameter (in.): 2  
NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 321

Emission Point: HPNG1

Height (ft.): 120 Diameter (in.): 76  
NYTMN (km.): 4786.256 NYTME (km.): 283.5 Building: 371



Emission Point: HPNG2  
Height (ft.): 120 Diameter (in.): 48  
NYTMN (km.): 4786.256 NYTME (km.): 283.513 Building: 371

Emission Point: HPNG3  
Height (ft.): 120 Diameter (in.): 48  
NYTMN (km.): 4786.256 NYTME (km.): 283.526 Building: 371

Emission Point: MPDF1  
Height (ft.): 120 Diameter (in.): 48  
NYTMN (km.): 4786.256 NYTME (km.): 283.539 Building: 371

Emission Point: PGT01  
Height (ft.): 120 Diameter (in.): 108  
NYTMN (km.): 4786.226 NYTME (km.): 283.534 Building: 371

**Item 39.2(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00008

Emission Point: 09103  
Height (ft.): 33 Diameter (in.): 16  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 091

Emission Point: 09104  
Height (ft.): 33 Diameter (in.): 16  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 091

Emission Point: 09105  
Height (ft.): 33 Diameter (in.): 16  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 091

Emission Point: 09106  
Height (ft.): 33 Diameter (in.): 16  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 091

Emission Point: 09107  
Height (ft.): 35 Diameter (in.): 2  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 091

Emission Point: 09503  
Height (ft.): 126 Diameter (in.): 42  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 095

Emission Point: 09504  
Height (ft.): 18 Length (in.): 24 Width (in.): 24  
NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 095

Emission Point: 09508  
Height (ft.): 18 Diameter (in.): 6



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NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 095

Emission Point: 09511  
 Height (ft.): 34 Diameter (in.): 8  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 095

Emission Point: 09601  
 Height (ft.): 21 Diameter (in.): 6  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 096

Emission Point: R1601  
 Height (ft.): 63 Diameter (in.): 48  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: R16

Emission Point: R1603  
 Height (ft.): 3 Diameter (in.): 4  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: R16

**Item 39.3(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00015

Emission Point: HPDF1 Removal Date: 06/01/2016  
 Height (ft.): 160 Diameter (in.): 77  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 321

Emission Point: PGT02 Removal Date: 06/01/2016  
 Height (ft.): 160 Diameter (in.): 74  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 321

Emission Point: PGT03 Removal Date: 06/01/2016  
 Height (ft.): 160 Diameter (in.): 74  
 NYTMN (km.): 4786.321 NYTME (km.): 283.129 Building: 321

**Item 39.4(From Mod 0):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00051

Emission Point: 32102  
 Height (ft.): 65 Diameter (in.): 96  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 321

Emission Point: 32106  
 Height (ft.): 135 Diameter (in.): 24  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 321

Emission Point: 32107  
 Height (ft.): 33 Diameter (in.): 6  
 NYTMN (km.): 4786.437 NYTME (km.): 284.912 Building: 321

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Emission Point: M9001  
Height (ft.): 24                      Diameter (in.): 10  
NYTMN (km.): 4786.437    NYTME (km.): 284.912    Building: M90

**Condition 40:    Process Definition By Emission Unit**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:6 NYCRR Subpart 201-6**

**Item 40.1(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00015  
Process: K07                              Source Classification Code: 1-02-004-01  
Process Description: No.6 fuel oil combustion in package boilers

Emission Source/Control: 031AC - Combustion  
Design Capacity: 98 million Btu per hour

Emission Source/Control: 031AD - Combustion  
Design Capacity: 98 million Btu per hour

Emission Source/Control: 031AE - Combustion  
Design Capacity: 98 million Btu per hour

Emission Source/Control: 031AF - Combustion  
Design Capacity: 98 million Btu per hour

**Item 40.2(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00015  
Process: K12                              Source Classification Code: 1-02-004-01  
Process Description:  
    No 6 fuel oil combustion in built-up Boiler 42 rated at  
    500 mmbtu/hr and Boiler 43 rated at 640 mmbtu/hr.

Emission Source/Control: 321AH - Combustion

Emission Source/Control: 321AI - Combustion

Emission Source/Control: 32101 - Control  
Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 32104 - Control  
Control Type: ELECTROSTATIC PRECIPITATOR

**Item 40.3(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00015  
Process: K13                              Source Classification Code: 1-02-002-03

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Process Description:

Bituminous coal combustion for built-up Boiler 42 rated at 500 mmbtu/hr and Boiler 43 rated at 640 mmbtu/hr.

Emission Source/Control: 321AH - Combustion

Emission Source/Control: 321AI - Combustion

Emission Source/Control: 32101 - Control  
Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 32104 - Control  
Control Type: ELECTROSTATIC PRECIPITATOR

**Item 40.4(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00015

Process: K14 Source Classification Code: 1-02-005-01

Process Description:

No 2 fuel oil combustion for Boiler #44 rated as 670 mmbtu/hr Post-5D MACT Deadline

Emission Source/Control: 321AJ - Combustion

Emission Source/Control: 32103 - Control  
Control Type: ELECTROSTATIC PRECIPITATOR

**Item 40.5(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00015

Process: K15 Source Classification Code: 1-02-002-02

Process Description:

Bituminous low sulfur coal combustion for Boiler #44 rated at 655 mmbtu/hr Pre-5D MACT Deadline.

Emission Source/Control: 321AJ - Combustion

Emission Source/Control: 32103 - Control  
Control Type: ELECTROSTATIC PRECIPITATOR

**Item 40.6(From Mod 1):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00015

Process: K16 Source Classification Code: 1-02-002-02

Process Description:

Coal combustion in Boiler #44 rated at 655 mmbtu/hr Post-5D MACT Deadline.

Emission Source/Control: 321AJ - Combustion









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Process: CIL Source Classification Code: 2-01-001-02

Process Description:

Emergency Stationary Reciprocating Internal Combustion Engines (RICE) - compression ignition (CI) engines less than 500 Brake HP which commenced construction or reconstruction before June 12, 2006

Emission Source/Control: CILBH - Combustion

**Item 40.16(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-NGINE

Process: DSL

Source Classification Code: 1-02-004-03

Process Description:

Diesel-fired engines with 6 NYCRR Part 227 applicability with would otherwise be Exempt or Trivial under Subpart 201-3.

Emission Source/Control: R227D - Combustion

**Item 40.17(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-NGINE

Process: EHG

Source Classification Code: 2-01-002-02

Process Description:

Emergency Stationary Reciprocating Internal Combustion Engines (RICE) with greater than 500 Brake HP which commenced construction or reconstruction before December 19, 2002

Emission Source/Control: EGBHP - Combustion

**Item 40.18(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: E-NGINE

Process: NGS

Source Classification Code: 1-02-006-03

Process Description:

Natural Gas-fired engines with 6 NYCRR Part 227 applicability which would otherwise be Exempt or Trivial under Subpart 201-3.

Emission Source/Control: R227N - Combustion

**Item 40.19(From Mod 0):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00008

Process: K02

Source Classification Code: 5-03-005-06

Process Description:





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Solvent metal cleaning machines with 6 NYCRR Part 226 applicability which would otherwise be exempt or trivial under Subpart 201-3.

Emission Source/Control: F0226 - Process

**Condition 1-25: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (f)**

**Item 1-25.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 1-25.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Building 321 Boilers Maintenance Mode  
Maintenance inspections and cleanouts for Emission Points 00003 and 00004 occur approximately twice every five years. During normal operations, Unit 43 is ducted to EP 00004. During these maintenance activities emissions from Units 43 (ES 321AI) may be re-ducted to the alternate stack for a period of up to 10 days as necessary to perform maintenance on the stack. Unit 42, ducted to EP 00003, and Unit 44, ducted to EP 00004, will not be re-ducted during maintenance procedure.

While emissions from ES 321AI are re-ducted during a maintenance mode, the affected boilers shall continue to operate in accordance with all applicable emission limits and requirements. Continuous opacity monitors on EP 00003 and EP 00004 will be used to monitor compliance with opacity limits during the maintenance mode.

RED shall notify the Department at least 30 days prior to implementing the maintenance mode which involves re-ducting emissions to the alternate stacks.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 114: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

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**Expired by Mod 1**

**Item 114.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 114.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

RED-Rochester proposes to modify the Eastman Business Park powerhouse infrastructure according to either one of two plans. For purposes of distinguishing between the two alternative plans, the permit includes references to "Scenario 1" and "Scenario 2". Scenario 1 is the complete curtailment of coal combustion and includes the conversion of existing coal-fired Boiler 44 (ES 321AJ) to natural gas, the addition of new gas-fired combined cycle turbines/HRSG, HP boilers (ES 321BJ, ES 321BL, ES 321BM) and an MP boiler (ES 321BK). Under Scenario 2, Boiler 44 would continue to operate as a coal-fired boiler, Boiler 43 (ES 321AI) would continue to operate as a 10% annual capacity factor limited use coal-fired boiler, MP dual fueled boiler would operate and the three proposed gas-fired boilers (HP Boilers ES 321BJ, ES 321BL, ES 321BM) will not be installed. Requirements for both scenarios are included in the permit to authorize construction.

RED shall provide notification to the Department as to which operating scenario will be employed, including a detailed start-up and shutdown schedule, at least 60 days prior to installing or modifying any of the emission sources permitted under Scenario 1 or 2. Along with this notification, RED shall submit an application for minor modification of the permit in order to remove requirements related to the eliminated option and provide any necessary clarification. This application shall be submitted in accordance the provisions of 6 NYCRR Part 201-6.6(c) and include the information specified in paragraph (3) of that subdivision.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-26: Compliance Certification  
Effective for entire length of Permit**



**New York State Department of Environmental Conservation**

Permit ID: 8-2699-00126/00001

Facility DEC ID: 8269900126



**Applicable Federal Requirement: 6 NYCRR 225-1.2 (a)**

**Item 1-26.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 1-26.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

RED operates bituminous coal fired Boiler 44 (ES 321AJ) which meets the criteria of Subdivision 225-1.2(a) for a newer coal boiler limited to 0.60 pounds of sulfur per million BTU gross heat content.

RED burns a mixture of fuels and shall comply with the equivalent emission rate variance described in Section 225-1.4. In order to demonstrate compliance, sulfur data shall be collected, tabulated, and reported pursuant to Sections 225-1.5 and 225-1.6 and in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014). Data must be retained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: BITUMINOUS COAL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.6 pounds per million Btus

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 115: Compliance Certification**

**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 115.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

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Permit ID: 8-2699-00126/00001

Facility DEC ID: 8269900126



Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 115.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

RED operates bituminous coal fired Boiler 44 (ES 321AJ) which meets the criteria of Subdivision 225-1.2(a) for a newer coal boiler limited to 0.60 pounds of sulfur per million BTU gross heat content.

RED burns a mixture of fuels and shall comply with the equivalent emission rate variance described in Section 225-1.4. In order to demonstrate compliance, sulfur data shall be collected, tabulated, and reported pursuant to Sections 225-1.5 and 225-1.6 and in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014). Data must be retained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: BITUMINOUS COAL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.6 pounds per million Btus

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-27: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 225-1.2 (c)**

**Item 1-27.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 1-27.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC



OPERATIONS

Monitoring Description:

RED operates bituminous coal fired Boilers 42 (ES 321AH) and Boiler 43 (ES 321AI) which are limited to the firing of solid fuel with a sulfur content of 2.5 lbs/mmBtu maximum, 1.9 lbs/mmBtu\* average, and 1.7 lbs/mmBtu\*\* annual average.

\* Averages are computed for each emission source by dividing the total sulfur content by the total gross heat content of all solid fuel received during any consecutive three-month period.

\*\* Annual averages are computed for each emission source by dividing the total sulfur content by the total gross heat content of all solid fuel received during any consecutive 12-month period.

RED burns a mixture of fuels and shall comply with the equivalent emission rate variance described in Section 225-1.4. In order to demonstrate compliance, sulfur data shall be collected, tabulated, and reported pursuant to Sections 225-1.5 and 225-1.6 and in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014). Data must be retained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: BITUMINOUS COAL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 2.5 pounds per million Btus

Monitoring Frequency: QUARTERLY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 116: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 116.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

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Facility DEC ID: 8269900126



**Item 116.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

RED operates bituminous coal fired Boilers 42 (ES 321AH) and Boiler 43 (ES 321AI) which are limited to the firing of solid fuel with a sulfur content of 2.5 lbs/mmBtu maximum, 1.9 lbs/mmBtu\* average, and 1.7 lbs/mmBtu\*\* annual average.

\* Averages are computed for each emission source by dividing the total sulfur content by the total gross heat content of all solid fuel received during any consecutive three-month period.

\*\* Annual averages are computed for each emission source by dividing the total sulfur content by the total gross heat content of all solid fuel received during any consecutive 12-month period.

RED burns a mixture of fuels and shall comply with the equivalent emission rate variance described in Section 225-1.4. In order to demonstrate compliance, sulfur data shall be collected, tabulated, and reported pursuant to Sections 225-1.5 and 225-1.6 and in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014). Data must be retained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: BITUMINOUS COAL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 2.5 pounds per million Btus

Monitoring Frequency: QUARTERLY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-28: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 225-1.2 (e)**

**Item 1-28.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

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Permit ID: 8-2699-00126/00001

Facility DEC ID: 8269900126



Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 1-28.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

RED operates stationary combustion installations that fire residual oil (#6 fuel oil), and are limited to the purchase of residual oil with a sulfur content of 0.50% sulfur on or after July 1, 2014 and to the firing of residual oil with a sulfur content of 0.50% on or after July 1, 2016.

RED burns a mixture of fuels and shall comply with the equivalent emission rate variance described in Section 225-1.4. In order to demonstrate compliance, sulfur data shall be collected, tabulated, and reported pursuant to Sections 225-1.5 and 225-1.6 and in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014). Data must be retained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL OIL)

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.50 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 117: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 117.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 117.2:**

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Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

RED operates stationary combustion installations that fire residual oil (#6 fuel oil), and are limited to the purchase of residual oil with a sulfur content of 0.50% sulfur on or after July 1, 2014 and to the firing of residual oil with a sulfur content of 0.50% on or after July 1, 2016.

RED burns a mixture of fuels and shall comply with the equivalent emission rate variance described in Section 225-1.4. In order to demonstrate compliance, sulfur data shall be collected, tabulated, and reported pursuant to Sections 225-1.5 and 225-1.6 and in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014). Data must be retained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL OIL)

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.50 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-29: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 225-1.2 (f)**

**Item 1-29.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 1-29.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

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On or after July 2, 2012, RED is limited to the purchase of number two heating oil with 0.0015 percent sulfur by weight or less. Compliance with this limit will be based on vendor certifications.

For combustion sources where a mixture of fuels is burned, RED shall comply with the equivalent emission rate variance described in Section 225-1.4. In order to demonstrate compliance, sulfur data shall be collected, tabulated, and reported pursuant to Sections 225-1.5 and 225-1.6 and in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014). Data must be retained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: OIL (NOT ELSEWHERE CLASSIFIED)  
Parameter Monitored: SULFUR CONTENT  
Upper Permit Limit: 0.0015 percent by weight  
Monitoring Frequency: PER DELIVERY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 118: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 118.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 118.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

On or after July 2, 2012, RED is limited to the purchase of number two heating oil with 0.0015 percent sulfur by weight or less. Compliance with this limit will be based on vendor certifications.

For combustion sources where a mixture of fuels is burned,

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RED shall comply with the equivalent emission rate variance described in Section 225-1.4. In order to demonstrate compliance, sulfur data shall be collected, tabulated, and reported pursuant to Sections 225-1.5 and 225-1.6 and in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014). Data must be retained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: OIL (NOT ELSEWHERE CLASSIFIED)  
Parameter Monitored: SULFUR CONTENT  
Upper Permit Limit: 0.0015 percent by weight  
Monitoring Frequency: PER DELIVERY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-30: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 225-1.2 (h)**

**Item 1-30.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 1-30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

On or after July 1, 2016, RED is limited to the firing of distillate oil with 0.0015 percent sulfur by weight or less. Compliance with this limit will be based on vendor certifications.

For combustion sources where a mixture of fuels is burned, RED shall comply with the equivalent emission rate variance described in Section 225-1.4. In order to demonstrate compliance, sulfur data shall be collected, tabulated, and reported pursuant to Sections 225-1.5 and 225-1.6 and in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014). Data must be



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retained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: OIL (NOT ELSEWHERE CLASSIFIED)  
Parameter Monitored: SULFUR CONTENT  
Upper Permit Limit: 0.0015 percent by weight  
Monitoring Frequency: PER DELIVERY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 119: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 119.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 119.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

On or after July 1, 2016, RED is limited to the firing of distillate oil with 0.0015 percent sulfur by weight or less. Compliance with this limit will be based on vendor certifications.

For combustion sources where a mixture of fuels is burned, RED shall comply with the equivalent emission rate variance described in Section 225-1.4. In order to demonstrate compliance, sulfur data shall be collected, tabulated, and reported pursuant to Sections 225-1.5 and 225-1.6 and in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014). Data must be retained for at least five years and made available to the Department upon request.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: OIL (NOT ELSEWHERE CLASSIFIED)  
Parameter Monitored: SULFUR CONTENT



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Permit ID: 8-2699-00126/00001

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Upper Permit Limit: 0.0015 percent by weight  
Monitoring Frequency: PER DELIVERY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-31: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 225-1.4**

**Item 1-31.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 1-31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Fuels with sulfur content greater than that allowed under Subdivision 225-1.2 may be fired when the facility owner can demonstrate that actual ANNUAL sulfur dioxide emissions (S-actual) do not exceed the value for allowable ANNUAL sulfur dioxide emissions (S-allowable) as calculated below.

For each calendar year, for each of boiler (Boiler 42(ES 321AH), Boiler 43 (ES 321AI) and Boiler 44 (ES 321AJ), the following two step calculation procedure shall be performed:

Step 1: Calculate an allowable Sulfur Dioxide emission limit by the equation:

$$S\text{-allowable} = ((1.1)(A\text{-allowable})(M) + (2)(B\text{-allowable})(T)) / (M+T)$$

Where

S-allowable is the allowable annual average Sulfur Dioxide emissions rate in pounds per million BTU

A-allowable is the allowable annual sulfur in oil limit from 6NYCRR, Part 225 in % Sulfur by weight



M is the annual actual average of % of total heat input from oil

B-allowable is the allowable annual Sulfur in coal limit from 6NYCRR, Part 225 in pounds per million BTU

T is the annual actual average of total heat input from coal

Step 2: Calculate whether the allowable Sulfur Dioxide emission limit is being met by the equation

$$S\text{-actual} = ((1.1)(A\text{-actual})(M) + (2)(B\text{-actual})(T)) / (M + T + G)$$

Where

S-actual is the annual average Sulfur Dioxide emissions rate in pounds per million BTU

A-actual is the actual annual sulfur in oil content, in % Sulfur by weight

M is as defined above

B-actual is the actual annual sulfur in coal content, in pounds per million BTU

T is as defined above

G is the annual actual average of total heat input from natural gas

In accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014), RED shall demonstrate compliance with the ANNUAL sulfur dioxide allowable limit in the Sulfur in Fuels reports submitted to the Department within 30 days from the end of each semiannual period. The annual report provided in January will be based on the calendar year. The annual report provided in July will be based on the period from July 1st of the previous year to June 30th of the current year.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-32: Compliance Certification**  
**Effective for entire length of Permit**



**Applicable Federal Requirement:6 NYCRR 225-1.4**

**Item 1-32.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 1-32.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Fuels with sulfur content greater than that allowed by Subdivision 225-1.2 may be fired when the facility owner can demonstrate that actual QUARTERLY sulfur dioxide emissions (S-actual) do not exceed the value for allowable QUARTERLY sulfur dioxide emissions (S-allowable) as calculated below.

For each calendar quarter, for each of boiler (Boiler 42 (ES 321AH), Boiler 43 (ES 321AI) and Boiler 44 (ES 321AJ)), the following two step calculation procedure shall be performed:

Step 1: Calculate an allowable Sulfur Dioxide emission limit by the equation

$$S\text{-allowable} = ((1.1)(A\text{-allowable})(M) + (2)(B\text{-allowable})(T)) / (M+T)$$

Where

S-allowable is the allowable quarterly average Sulfur Dioxide emissions rate in pounds per million BTU

A-allowable is the allowable quarterly sulfur in oil limit from 6NYCRR, Part 225 in % Sulfur by weight

M is the quarterly actual average of % of total heat input from oil

B-allowable is the allowable quarterly sulfur in coal limit from 6NYCRR, Part 225 in pounds per million BTU

T is the quarterly actual average of total heat input from coal



Step 2: Calculate whether the allowable Sulfur Dioxide emissions limit is being met by the equation

$$S\text{-actual} = ((1.1)(A\text{-actual})(M) + (2)(B\text{-actual})(T)) / (M + T + G)$$

Where

S-actual is the actual quarterly average Sulfur Dioxide emissions rate in pounds per million BTU

A-actual is the actual quarterly sulfur in oil content, in % Sulfur by weight

M is as defined above

B-actual is the actual quarterly sulfur in coal content, in pounds per million BTU

T is as defined above

G is the quarterly actual average of total heat input from natural gas

In accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014), RED shall demonstrate compliance with the QUARTERLY sulfur dioxide allowable limit in the Sulfur in Fuels reports submitted to the Department within 30 days from the end of each quarter.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 120: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 120.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 120.2:**

**New York State Department of Environmental Conservation**

Permit ID: 8-2699-00126/00001

Facility DEC ID: 8269900126



Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Fuels with sulfur content greater than that allowed under Subdivision 225-1.2 may be fired when the facility owner can demonstrate that actual ANNUAL sulfur dioxide emissions (S-actual) do not exceed the value for allowable ANNUAL sulfur dioxide emissions (S-allowable) as calculated below.

For each calendar year, for each of boiler (Boiler 42(ES 321AH), Boiler 43 (ES 321AI) and Boiler 44 (ES 321AJ), the following two step calculation procedure shall be performed:

Step 1: Calculate an allowable Sulfur Dioxide emission limit by the equation:

$$S\text{-allowable} = ((1.1)(A\text{-allowable})(M) + (2)(B\text{-allowable})(T)) / (M+T)$$

Where

S-allowable is the allowable annual average Sulfur Dioxide emissions rate in pounds per million BTU

A-allowable is the allowable annual sulfur in oil limit from 6NYCRR, Part 225 in % Sulfur by weight

M is the annual actual average of % of total heat input from oil

B-allowable is the allowable annual Sulfur in coal limit from 6NYCRR, Part 225 in pounds per million BTU

T is the annual actual average of total heat input from coal

Step 2: Calculate whether the allowable Sulfur Dioxide emission limit is being met by the equation

$$S\text{-actual} = ((1.1)(A\text{-actual})(M) + (2)(B\text{-actual})(T)) / (M + T + G)$$

Where

S-actual is the annual average Sulfur Dioxide emissions rate in pounds per million BTU

A-actual is the actual annual sulfur in oil content, in % Sulfur by weight



M is as defined above

B-actual is the actual annual sulfur in coal content, in pounds per million BTU

T is as defined above

G is the annual actual average of total heat input from natural gas

In accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014), RED shall demonstrate compliance with the ANNUAL sulfur dioxide allowable limit in the Sulfur in Fuels reports submitted to the Department within 30 days from the end of each semiannual period. The annual report provided in January will be based on the calendar year. The annual report provided in July will be based on the period from July 1st of the previous year to June 30th of the current year.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 121: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 121.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 121.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Fuels with sulfur content greater than that allowed by Subdivision 225-1.2 may be fired when the facility owner can demonstrate that actual QUARTERLY sulfur dioxide emissions (S-actual) do not exceed the value for allowable QUARTERLY sulfur dioxide emissions (S-allowable) as



calculated below.

For each calendar quarter, for each of boiler (Boiler 42 (ES 321AH), Boiler 43 (ES 321AI) and Boiler 44 (ES 321AJ)), the following two step calculation procedure shall be performed:

Step 1: Calculate an allowable Sulfur Dioxide emission limit by the equation

$$S\text{-allowable} = ((1.1)(A\text{-allowable})(M) + (2)(B\text{-allowable})(T)) / (M+T)$$

Where

S-allowable is the allowable quarterly average Sulfur Dioxide emissions rate in pounds per million BTU

A-allowable is the allowable quarterly sulfur in oil limit from 6NYCRR, Part 225 in % Sulfur by weight

M is the quarterly actual average of % of total heat input from oil

B-allowable is the allowable quarterly sulfur in coal limit from 6NYCRR, Part 225 in pounds per million BTU

T is the quarterly actual average of total heat input from coal

Step 2: Calculate whether the allowable Sulfur Dioxide emissions limit is being met by the equation

$$S\text{-actual} = ((1.1)(A\text{-actual})(M) + (2)(B\text{-actual})(T)) / (M + T + G)$$

Where

S-actual is the actual quarterly average Sulfur Dioxide emissions rate in pounds per million BTU

A-actual is the actual quarterly sulfur in oil content, in % Sulfur by weight

M is as defined above

B-actual is the actual quarterly sulfur in coal content, in pounds per million BTU

T is as defined above



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G is the quarterly actual average of total heat input from natural gas

In accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014), RED shall demonstrate compliance with the QUARTERLY sulfur dioxide allowable limit in the Sulfur in Fuels reports submitted to the Department within 30 days from the end of each quarter.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-33: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 225-1.5**

**Item 1-33.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 1-33.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Paragraph 225-1.3(a)(3), fuel monitoring requirements apply to the facility which is subject to a sulfur dioxide equivalent emission rate for fuel mixtures pursuant to Subdivision 225-1.4(a).

Fuel sampling and sulfur analysis shall be conducted and results summarized and submitted to the Department on a quarterly basis in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014).

Measurements must be made daily of the rate of each fuel fired. The gross heat content and ash content of each fuel fired must be determined at least once each week. In the case of stationary combustion installations producing electricity for sale, the average electrical output and the hourly generation rate must also be measured.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 122: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 122.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 122.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Paragraph 225-1.3(a)(3), fuel monitoring requirements apply to the facility which is subject to a sulfur dioxide equivalent emission rate for fuel mixtures pursuant to Subdivision 225-1.4(a).

Fuel sampling and sulfur analysis shall be conducted and results summarized and submitted to the Department on a quarterly basis in accordance with RED's Fuel Sampling and Analysis Plan (approved October 2014).

Measurements must be made daily of the rate of each fuel fired. The gross heat content and ash content of each fuel fired must be determined at least once each week. In the case of stationary combustion installations producing electricity for sale, the average electrical output and the hourly generation rate must also be measured.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-34: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 225-1.6 (f)**

**Item 1-34.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: U-00015

**Item 1-34.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility owners subject to this Subpart must submit a written report of the fuel sulfur content exceeding the applicable sulfur-in-fuel limitation, measured emissions exceeding the applicable sulfur-in-fuel limitation, measured emissions exceeding the applicable equivalent emission rate, and the nature and cause of such exceedances if known, for each calendar quarter, within 30 days after the end of any quarterly period in which an exceedance takes place.

Monitoring Frequency: QUARTERLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 123: Compliance Certification**

**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 123.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 123.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility owners subject to this Subpart must submit a written report of the fuel sulfur content exceeding the applicable sulfur-in-fuel limitation, measured emissions exceeding the applicable sulfur-in-fuel limitation, measured emissions exceeding the applicable equivalent emission rate, and the nature and cause of such exceedances if known, for each calendar quarter, within 30 days after the end of any quarterly period in which an exceedance takes place.

Monitoring Frequency: QUARTERLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-35: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)**

**Replaces Condition(s) 125**

**Item 1-35.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 1-35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

RED operates one new natural gas fired turbine, one HRSG (EP PGT01), one new MP Boiler (EP MPDF1) and three new HP Gas-fired boilers (EPs HPNG1, EP HPNG2, EP HPNG3) subject to the opacity standards of Section 227-1.3. These sources shall not operate at greater than 20 percent opacity (six minute average), except for one-six-minute period per hour of not more than 27 percent opacity.

RED shall conduct a Method 9 test to demonstrate compliance with the opacity limit within 180 days after initial startup of the applicable equipment. Thereafter, RED will conduct observations of visible emissions from the applicable emission points on a semiannual basis while the process is in operation. The permittee will investigate, in a timely manner, any instance where visible emissions (other than steam) are observed.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Records of visible emissions (VE) observations, any follow-up Method 9 tests, investigations and corrective

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actions shall be kept on-site and made available to the Department upon request. VE observation records shall include: the date and time interval of all opacity observations; the name and affiliation of the observer; the current VE reading certification issued to the observer in the case of a Method 9 observation; and VE observation data sheets.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: Method 9  
Monitoring Frequency: SEMI-ANNUALLY  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-36: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)**

**Item 1-36.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 1-36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)  
Monitoring Description:

For combustion sources equipped with Continuous Opacity Monitors (COMs): Bldg 31 Package Boilers 1- 4 / EP 00001; Boiler 42/ EP 00003; Boiler 43 and Boiler 44; RED shall emit no greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average utilizing a continuous opacity monitor (COM).

Notwithstanding the quarterly reporting requirements of Part 227-1.4(b), compliance with the opacity limit stated above shall be included in the Semi-annual Compliance Monitoring Report, pursuant to 201-6.5(c)(2).

Manufacturer Name/Model Number: PHOENIX INSTRUMENTS OPAC 20/20  
Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: Method 9  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 6 MINUTE AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 124: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 124.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 124.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

For combustion sources equipped with Continuous Opacity Monitors (COMs): Bldg 31 Package Boilers 1- 4 / EP 00001; Boiler 42/ EP 00003; Boiler 43, Boiler 44, and new MP dual fuel Boiler 1/ EP 00004; and new HP dual fuel Boiler 1/ EP HPDF1, RED shall emit no greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average utilizing a continuous opacity monitor (COM).

Notwithstanding the quarterly reporting requirements of Part 227-1.4(b), compliance with the opacity limit stated above shall be included in the Semi-annual Compliance Monitoring Report, pursuant to 201-6.5(c)(2).

Manufacturer Name/Model Number: PHOENIX INSTRUMENTS OPAC 20/20

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: CONTINUOUS

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 125: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-35**

**Item 125.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: U-00015

**Item 125.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

RED operates three new natural gas fired turbines/HRSGs (EPs PGT01, PGT02, PGT03) and two new HP Gas-fired boilers (EP HPNG1, EP HPNG2) subject to the opacity standards of Section 227-1.3. These sources shall not operate at greater than 20 percent opacity (six minute average), except for one-six-minute period per hour of not more than 27 percent opacity.

RED shall conduct a Method 9 test to demonstrate compliance with the opacity limit within 180 days after initial startup of the applicable equipment. Thereafter, RED will conduct observations of visible emissions from the applicable emission points on a semiannual basis while the process is in operation. The permittee will investigate, in a timely manner, any instance where visible emissions (other than steam) are observed.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Records of visible emissions (VE) observations, any follow-up Method 9 tests, investigations and corrective actions shall be kept on-site and made available to the Department upon request. VE observation records shall include: the date and time interval of all opacity observations; the name and affiliation of the observer; the current VE reading certification issued to the observer in the case of a Method 9 observation; and VE observation data sheets.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: SEMI-ANNUALLY

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Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-37: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-1.4 (b)**

**Replaces Condition(s) 126**

**Item 1-37.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 1-37.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a stationary combustion installation which utilizes a continuous opacity monitoring system (COMS) shall include the following in their quarterly Excess Visible Emissions and Opacity Monitor Downtime Report:

- 1) the magnitude, location (building, emission point and boiler #), date, and time of each six minute block average during which the average opacity of emissions exceeds 20 percent, except for one six minute block average per hour not to exceed 27 percent;
- 2) for each period of excess emissions, specific identification of the cause and corrective action taken;
- 3) identification of all periods of COMS downtime, including the date, time, and duration of each inoperable period, and the cause and corrective action for each COMS downtime period;
- 4) the total time during which the COMS were required to record data during the reporting period;
- 5) the total number of exceedances and the duration of exceedances expressed as a percentage of the total time during which the COMS were required to record data;
- 6) the number of exceedances due to Start-up, Shut-down and Malfunction conditions and indication of those



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Malfunctions which were reported to the Department under Part 201-1.4 as a potentially excused exceedances.

7) other information as the Department may deem necessary, proper or desirable in order to enforce Article 19 of the Environmental Conservation Law (ECL) or the rules promulgated thereunder.

Monitoring Frequency: CONTINUOUS  
Reporting Requirements: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 3 calendar month(s).

**Condition 126: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-37**

**Item 126.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 126.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a stationary combustion installation which utilizes a continuous opacity monitoring system (COMS) shall include the following in their quarterly Excess Visible Emissions and Opacity Monitor Downtime Report:

- 1) the magnitude, location (building, emission point and boiler #), date, and time of each six minute block average during which the average opacity of emissions exceeds 20 percent, except for one six minute block average per hour not to exceed 27 percent;
- 2) for each period of excess emissions, specific identification of the cause and corrective action taken;
- 3) identification of all periods of COMS downtime, including the date, time, and duration of each inoperable period, and the cause and corrective action for each COMS downtime period;
- 4) the total time during which the COMS were required to

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record data during the reporting period;

5) the total number of exceedences and the duration of exceedences expressed as a percentage of the total time during which the COMS were required to record data;

6) the number of exceedences due to Start-up, Shut-down and Malfunction conditions and indication of those Malfunctions which were reported to the Department under Part 201-1.4 as a potentially excused exceedences.

7) other information as the Department may deem necessary, proper or desirable in order to enforce Article 19 of the Environmental Conservation Law (ECL) or the rules promulgated thereunder.

Monitoring Frequency: CONTINUOUS  
Reporting Requirements: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 10/30/2015.  
Subsequent reports are due every 3 calendar month(s).

**Condition 1-38: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR Subpart 227-2**

**Item 1-38.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 1-38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All emission limits based on heat input correspond to the Higher Heating Value (HHV) of the fuel burned. The limits apply at all loads of operation, except during periods of startup and shutdown (not to exceed three hours per occurrence), malfunctions (as defined in 6 NYCRR Part 201-2.1(b)(22)), periods of low steam demand (weekend turndown cycles), and periods of gas curtailment.

NOx limits during periods of low steam demand (low load) shall be determined by a plot of NOx vs. load, percent gas (or coal) vs. load, which were established following completion of the gas reburn studies on Boilers 42 and 43 and submitted to the Department on January 19, 1999 and February 3, 1998, respectively.



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During periods of a natural gas curtailment, NOx emissions shall be minimized according to the procedures of the Natural Gas Curtailment Plan, subject to Department approval.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-39: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR Subpart 227-2**

**Item 1-39.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 1-39.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A summary of the emission limits and operating restrictions for this permit must be posted in the Building 31, 321 and 371 control rooms and must be plainly visible (without obstructions) to the operator(s) of the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 128: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 128.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 128.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All emission limits based on heat input correspond to the Higher Heating Value (HHV) of the fuel burned. The limits apply at all loads of operation, except during periods of startup and shutdown (not to exceed three hours per occurrence), malfunctions (as defined in 6 NYCRR Part 201-2.1(b)(22)), periods of low steam demand (weekend turndown cycles), and periods of gas curtailment.

NOx limits during periods of low steam demand (low load) shall be determined by a plot of NOx vs. load, percent gas (or coal) vs. load, which were established following completion of the gas reburn studies on Boilers 42 and 43 and submitted to the Department on January 19, 1999 and February 3, 1998, respectively.

During periods of a natural gas curtailment, NOx emissions shall be minimized according to the procedures of the Natural Gas Curtailment Plan, subject to Department approval.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 129: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 129.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 129.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A summary of the emission limits and operating restrictions for this permit must be posted in the Building 31 and 321 control rooms and must be plainly visible (without obstructions) to the operator(s) of the facility.

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 130: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-5**

**Item 130.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00015

Process: K24

Emission Source: 321BL

Emission Unit: U-00015

Process: K24

Emission Source: 321BM

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 130.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

This condition applies to natural gas only fired very large boilers. The owner or operator shall install, calibrate, maintain, and operate a CEMS for the monitoring of NO<sub>x</sub> in accordance with the requirements of this subpart.

Compliance with the emission limit will be based on a 24-hour heat input weighted average from May 1st through September 30th. Compliance with the emission limit will be based on a 30-day rolling heat input weighted average from October 1st through April 30th.

Owners or operators required to use 40 CFR Part 75 monitoring reference methods are required to do so. Any other owners or operators may use either 40 CFR Part 60 or 40 CFR Part 75 monitoring reference methods.

The owner or operator will maintain records on-site for a minimum of five years.

The compliance deadline, with the emission limitation

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listed in this condition, is July, 1 2014. Compliance with the monitoring, record keeping, or reporting requirements listed in this condition begins on July, 1 2014.

Manufacturer Name/Model Number: NOx Analyzer  
Parameter Monitored: OXIDES OF NITROGEN  
Upper Permit Limit: 0.08 pounds per million Btus  
Reference Test Method: See monitoring description  
Monitoring Frequency: CONTINUOUS  
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION  
Reporting Requirements: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 10/30/2015.  
Subsequent reports are due every 3 calendar month(s).

**Condition 1-40: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-2.4 (a) (2)**

**Item 1-40.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-40.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

In order to comply with Subpart Part 227-2 NOx RACT requirements, NOx emissions from Boiler 44 (ES 321AJ) are limited to 0.42 lb/mmBtu when combusting coal and backup No. 2 oil.

Compliance with these limits will be demonstrated through the use of a continuous monitoring system according to the requirements of Part 227-2.6. Emission limits are based on a 24 hour average during the ozone season and a 30-day rolling average during the non-ozone season.

Manufacturer Name/Model Number: TECO 42  
Upper Permit Limit: 0.42 pounds per million Btus  
Reference Test Method: Method 7E  
Monitoring Frequency: CONTINUOUS  
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 132: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 132.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 132.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

In order to comply with Subpart Part 227-2 NOx RACT requirements, NOx emissions from Boiler 44 (ES 321AJ) are limited to 0.42 lb/mmBtu.

Compliance with these limits will be demonstrated through the use of a continuous monitoring system according to the requirements of Part 227-2.6. Emission limits are based on a 24 hour average during the ozone season and a 30-day rolling average during the non-ozone season.

In the case that RED decides to employ Scenario 2 and continue to operate Boiler 44 as a coal-fired boiler, a re-evaluation of Part 227-2 NOx RACT requirements shall be submitted along with the notification to the Department required under a Part 201-6.6 condition elsewhere in this permit.

Manufacturer Name/Model Number: TECO 42

Upper Permit Limit: 0.42 pounds per million Btus

Reference Test Method: Method 7E

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING

**DESCRIPTION**

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-41: Compliance Certification**

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**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-2.4 (e) (3)**

**Replaces Condition(s) 133**

**Item 1-41.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0      OXIDES OF NITROGEN

**Item 1-41.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

RED operates one (1) gas-fired (with capability to fire No. 2 Fuel Oil) 50 Megawatt gas turbine (Emission Source 321BA) and one (1) gas-fired Heat Recovery Steam Generating Unit (HRSG) (Emission Source 321BE) subject to the NOx RACT requirements. These sources are included in Processes K21 and K22.

RED previously submitted a NOx RACT Plan, dated June 2014 (Revised October 2014) for the combined gas turbine/HRSG unit. RED will submit a revised case-by-case NOx RACT to the Department at least 60 days prior to turbine/HRSG installation.

Compliance with these limits will be demonstrated through the use of a continuous monitoring system according to the requirements of Part 227-2.6. Emission limits are based on a 24 hour average during the ozone season and a 30-day rolling average during the non-ozone season.

Owners or operators required to use 40 CFR Part 75 monitoring reference methods are required to do so. Any other owners or operators may use either 40 CFR Part 60 or 40 CFR Part 75 monitoring reference methods.

The owner or operator will maintain records on-site for a minimum of five years.

Manufacturer Name/Model Number: NOT YET DETERMINED

Upper Permit Limit: 0.02 pounds per million Btus

Reference Test Method: METHOD 7E

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 133: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-41**

**Item 133.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 133.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

RED operates three (3) gas-fired 11 Megawatt gas turbines (Emission Sources 321BA, 321BB, 321BC) and three (3) gas-fired 220 KPPH (thousand pound per hour) Heat Recovery Steam Generating Units (HRSGs) (Emission Sources 321BE, 321BF, 321BG) subject to the NO<sub>x</sub> RACT requirements. These sources are included in Processes K21 and K22. In accordance with the NO<sub>x</sub> RACT Plan, dated June 2014 (Revised October 2014), NO<sub>x</sub> emissions will be reduced through the use of Selective Catalytic Reduction (SCR) and limited to 0.02 lbs NO<sub>x</sub>/mmBtu from each combined gas turbine/HRSG unit.

Compliance with these limits will be demonstrated through the use of a continuous monitoring system according to the requirements of Part 227-2.6. Emission limits are based on a 24 hour average during the ozone season and a 30-day rolling average during the non-ozone season.

Owners or operators required to use 40 CFR Part 75 monitoring reference methods are required to do so. Any other owners or operators may use either 40 CFR Part 60 or 40 CFR Part 75 monitoring reference methods.

The owner or operator will maintain records on-site for a minimum of five years.

Manufacturer Name/Model Number: NOT YET DETERMINED

Upper Permit Limit: 0.02 pounds per million Btus

Reference Test Method: METHOD 7E

Monitoring Frequency: CONTINUOUS

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Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-42: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-2.6**

**Replaces Condition(s) 134**

**Item 1-42.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-42.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

RED is required to operate certified continuous monitoring and recording systems (CEM), or an equivalent monitoring system approved by the department, to measure NO<sub>x</sub> and either CO<sub>2</sub> or O<sub>2</sub> in the exhaust stack of the following units: Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Boiler 44 (ES 321AJ), new MP Dual Fuel Boiler (ES 321BK), and the combined Gas Turbine/Heat Recovery Steam Generating Unit (HRSG) (ES 321BA/321BE). These CEM systems shall be calibrated and maintained and shall meet the requirements of 6 NYCRR 227-2.6. The Department shall be notified 30 days in advance of the date upon which CEM system performance demonstration are scheduled to commence.

A quarterly written CEM report shall be submitted to NYSDEC for every calendar year quarter in accordance with the requirements of subparagraph 227-2.6(b)(4)(iv). All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter and shall include:

- (i) A summary of excess emissions and CEMs downtime reported in the format acceptable to the Department.
- (ii) The results of the quarterly monitoring performance

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audit, reported in the format of 40 CFR 60 Appendix F (or equivalent).

(iii) Excess emissions shall be identified as any 24 hour block period or 30 day average depending upon the time of the year during which the average emissions of NO<sub>x</sub>, as measured by the CEM system, exceeds the corresponding mass or concentration emission limits set forth in Section I.

(iv) For the purposes of this permit, excess emissions indicated by the CEM system for 24 hour or 30 day block, depending upon the time of year, periods other than startups, shutdowns and malfunctions (6 NYCRR 201.5(d)) may be considered violations of the applicable emission limits.

A file of all measurements shall be maintained, including CEM system performance evaluations; all CEM systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. Files of such measurements, maintenance, reports, and records shall be retained for at least five years.

Monitoring Frequency: CONTINUOUS  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-43: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-2.6**

**Item 1-43.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
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**Item 1-43.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

In accordance with Paragraph 227-2.6(a)(4), a certified continuous monitoring and recording systems (CEMs), or an equivalent monitoring system approved by the department,

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to measure NO<sub>x</sub> and either CO<sub>2</sub> or O<sub>2</sub> in the exhaust stack of the Gas Turbine (Emission Source 321BA) and Heat Recovery Steam Generating Unit (HRSG) (Emission Source 321BE), represented by Processes K21 and K22, is required.

These CEM systems shall be calibrated and maintained and shall meet the requirements of 6 NYCRR 227-2.6. The Department shall be notified 30 days in advance of the date upon which CEM system performance demonstration are scheduled to commence.

A quarterly written CEM report shall be submitted to NYSDEC for every calendar year quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter and shall include:

(i) A summary of excess emissions and CEMs downtime reported in the format acceptable to the Department.

(ii) The results of the quarterly monitoring performance audit, reported in the format of 40 CFR 60 Appendix F (or equivalent).

(iii) Excess emissions shall be identified as any 24 hour block period or 30 day average depending upon the time of the year during which the average emissions of NO<sub>x</sub>, as measured by the CEM system, exceeds the corresponding mass or concentration emission limits set forth in Section I.

(iv) For the purposes of this permit, excess emissions indicated by the CEM system for 24 hour or 30 day block, depending upon the time of year, periods other than startups, shutdowns and malfunctions (6 NYCRR 201.5(d)) may be considered violations of the applicable emission limits.

A file of all measurements shall be maintained, including CEM system performance evaluations; all CEM systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. Files of such measurements, maintenance, reports, and records shall be retained for at least five years.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-44: Compliance Certification**



**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 227-2.6**

**Item 1-44.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

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**Item 1-44.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In accordance with Paragraph 227-2.6(a)(1), a certified continuous monitoring and recording systems (CEMs), or an equivalent monitoring system approved by the department, to measure NO<sub>x</sub> and either CO<sub>2</sub> or O<sub>2</sub> in the exhaust stack of the new HP and MP Dual Fuel Boilers (Emission Sources 321BL, 321BN, 321BM and 321BK), represented by Process K23 and K24 (>250 mmbBtu/hr) is required. These CEM systems shall be calibrated and maintained and shall meet the requirements of 6 NYCRR 227-2.6. The Department shall be notified 30 days in advance of the date upon which CEM system performance demonstration are scheduled to commence.

A quarterly written CEM report shall be submitted to NYSDEC for every calendar year quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter and shall include:

(i) A summary of excess emissions and CEMs downtime reported in the format acceptable to the Department.

(ii) The results of the quarterly monitoring performance audit, reported in the format of 40 CFR 60 Appendix F (or equivalent).

(iii) Excess emissions shall be identified as any 24 hour block period or 30 day average depending upon the time of the year during which the average emissions of NO<sub>x</sub>, as measured by the CEM system, exceeds the corresponding mass or concentration emission limits set forth in Section I.

(iv) For the purposes of this permit, excess emissions indicated by the CEM system for 24 hour or 30 day block,

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depending upon the time of year, periods other than startups, shutdowns and malfunctions (6 NYCRR 201.5(d)) may be considered violations of the applicable emission limits.

A file of all measurements shall be maintained, including CEM system performance evaluations; all CEM systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. Files of such measurements, maintenance, reports, and records shall be retained for at least five years.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 134: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-42**

**Item 134.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 134.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

RED is required to operate certified continuous monitoring and recording systems (CEM) to measure NO<sub>x</sub> and either CO<sub>2</sub> or O<sub>2</sub> in the exhaust stack of the following units: Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Boiler 44 (ES 321AJ), new HP and MP Dual Fuel Boilers (ES 321BJ and ES 321BK), and the combined Gas Turbine/Heat Recovery Steam Generating Units (HRSGs) (ES 321BA/321BE, ES 321BB/321BF, ES 321BC/321BG). These CEM systems shall be calibrated and maintained and shall meet the requirements of 6 NYCRR 227-2.6. The Department shall be notified 30 days in advance of the date upon which CEM system performance demonstration are scheduled to commence.

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A quarterly written CEM report shall be submitted to NYSDEC for every calendar year quarter in accordance with the requirements of subparagraph 227-2.6(b)(4)(iv). All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter and shall include:

(i) A summary of excess emissions and CEMs downtime reported in the format acceptable to the Department.

(ii) The results of the quarterly monitoring performance audit, reported in the format of 40 CFR 60 Appendix F (or equivalent).

(iii) Excess emissions shall be identified as any 24 hour block period or 30 day average depending upon the time of the year during which the average emissions of NO<sub>x</sub>, as measured by the CEM system, exceeds the corresponding mass or concentration emission limits set forth in Section I.

(iv) For the purposes of this permit, excess emissions indicated by the CEM system for 24 hour or 30 day block, depending upon the time of year, periods other than startups, shutdowns and malfunctions (6 NYCRR 201.5(d)) may be considered violations of the applicable emission limits.

A file of all measurements shall be maintained, including CEM system performance evaluations; all CEM systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR Part 60 recorded in a permanent form suitable for inspection. Files of such measurements, maintenance, reports, and records shall be retained for at least five years.

Monitoring Frequency: CONTINUOUS  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-45: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-2.6 (b)**

**Item 1-45.1:**  
The Compliance Certification activity will be performed for:

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Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-45.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For sources equipped with Continuous Emission Monitoring System (CEMS) for monitoring NOx emissions, RED must follow an approved CEMS monitoring plan, submitted in accordance with Paragraph 227-2.6(b)(1).

A CEMS certification protocol, as specified in Paragraph 227-2.6(b)(2), must be submitted at least 60 days prior to compliance testing.

The CEMS must be installed, calibrated, maintained, and operated in accordance with the CEMS certification protocol, and must record the output of each such system. The procedures and test methods in Subparagraphs 227-2.6(b)(3)(i - vii) must be used for determining compliance with the relevant NOx emission limit under Section 227- 2.4.

RED must follow the CEMS recordkeeping and reporting requirements of Paragraph 227-2.6(b)(4).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-46: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 231-6.2**

**Replaces Condition(s) 137**

**Item 1-46.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-46.2:**

Compliance Certification shall include the following monitoring:



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Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to ensure emissions of volatile organic compounds (VOC) remain below the 40 tpy Nonattainment New Source Review (NNSR) significant net emissions increase applicability threshold, VOC emissions from the following sources shall be limited to 47.6 tons per year on a 12-month rolling basis:

- Modified Boiler 44 (ES 321 AJ) operating under Process K14 and K20
- One new Gas-fired Turbine and HRSG (ES 321BA/ 321BE) operating under Process K21 and K22
- One new dual fueled MP Boiler (ES 321BK) operating under Process K23 and K24
- Three new gas-only HP Boilers (ES321BL & 321BM & 321BN) operating under Process K24.

The record keeping requirements to demonstrate compliance with this annual limit shall be effective upon start-up of the new or modified equipment. Emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan and will be based on fuel use, operating records and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: VOC

Upper Permit Limit: 47.6 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-47: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 231-6.2**

**Replaces Condition(s) 138**

**Item 1-47.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-47.2:**

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Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under the Final Scenario, in order to ensure emissions of oxides of nitrogen (NO<sub>x</sub>) remain below the 40 tpy Nonattainment New Source Review (NNSR) significant net emission increase applicability threshold, NO<sub>x</sub> emissions from the following sources shall be limited to 1038.8 tons per year on a 12-month rolling basis:

- Modified Boiler 44 (ES 321AJ) operating under Process K14 and K20
- One Gas-fired Turbine and HRSG (ES 321BA/ 321BE operating under Process K21 and K22
- One new dual fueled MP Boiler (ES 321BK) operating under Process K23 and K24
- Three new gas-only HP Boilers (ES 321BL & 321BM & 321BN) operating under Process K24

The record keeping requirements to demonstrate compliance with this annual limit shall be effective upon start-up of the new or modified equipment. Emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 1038.8 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 136: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 136.1:**

The Compliance Certification activity will be performed for:



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Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: ONY210-00-0 OXIDES OF NITROGEN

**Item 136.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under Scenario 2, in order to ensure emissions of oxides of nitrogen (NOx) remain below the 40 tpy Nonattainment New Source Review (NNSR) significant net emission increase applicability threshold, project emissions shall be limited as follows:

Emissions of NOx from all sources included in the project: Package Boilers 1- 4 (ES 031AC - 031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES 321BB/ 321BF, ES 321BC/ 321BG), and the dual-fueled MP Boiler (ES 321BK); are limited to 424.4 tons per year on a 12-month rolling basis.

If Scenario 2 is implemented, the record keeping requirements to demonstrate compliance with this annual NOx limit, shall be effective upon start-up of the new or modified equipment. NOx emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on Continuous Emission Monitors (CEMS) data, where available; fuel use and operating records; and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 424.4 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 137: Compliance Certification**

**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-46**

**Item 137.1:**

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The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY998-00-0    VOC

**Item 137.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under Scenario 1, in order to ensure emissions of volatile organic compounds (VOC) remain below the 40 tpy Nonattainment New Source Review (NNSR) significant net emission increase applicability threshold, project emissions shall be limited as follows:

Emissions of VOC from all sources included in the project: Package Boilers 1- 4 (ES 031AC - 031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Boiler 44 (ES 321AJ), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES 321BB/ 321BF, ES 321BC/ 321BG), dual fueled HP and MP Boilers (ES 321BJ, ES 321BK), and two gas-only HP Boilers (ES 321BL & 321BM); are limited to 44.0 tons per year on a 12-month rolling basis.

If Scenario 1 is implemented, the record keeping requirements to demonstrate compliance with this annual VOC limit shall be effective upon start-up of the new or modified equipment. VOC emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.

If Scenario 2 is implemented, netting for VOC emissions would not be required and VOC emissions would not be limited on an annual basis.

Parameter Monitored: VOC

Upper Permit Limit: 44.0 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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**Condition 138: Compliance Certification**  
Effective between the dates of 09/11/2015 and Permit Expiration Date

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-47**

**Item 138.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 138.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under Scenario 1, in order to ensure emissions of oxides of nitrogen (NO<sub>x</sub>) remain below the 40 tpy Nonattainment New Source Review (NNSR) significant net emission increase applicability threshold, project emissions shall be limited as follows:

Emissions of NO<sub>x</sub> from all sources included in the project: Package Boilers 1- 4 (ES 031AC - 031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Boiler 44 (ES 321AJ), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES 321BB/ 321BF, ES 321BC/ 321BG), dual-fueled HP and MP Boilers (ES 321BJ & ES 321BK), and two gas-only HP Boilers (ES 321BL & ES 321BM); are limited to 684.0 tons per year on a 12-month rolling basis.

If Scenario 1 is implemented, the record keeping requirements to demonstrate compliance with this annual NO<sub>x</sub> limit, shall be effective upon start-up of the new or modified equipment. NO<sub>x</sub> emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on Continuous Emission Monitors (CEMS) data, where available; fuel use and operating records; and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 684.0 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-48: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 231-8.2**

**Item 1-48.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-02-5 PM 2.5

**Item 1-48.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to ensure emissions of PM-2.5 remain below the 10 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold, PM-2.5 emissions from the following sources shall be limited to 448.3 tons per year on a 12-month rolling basis:

- Modified Boiler 44 (ES 321AJ) operating under Process K14 and K20
- One Gas-fired Turbine and HRSG (ES 321BA/ 321BE operating under Process K21 and K22
- One new dual fueled MP Boiler (ES 321BK) operating under Process K23 and K24
- Three new gas-only HP Boilers (ES 321BL & 321BM & 321BN) operating under Process K24.

The record keeping requirements to demonstrate compliance with this annual limit shall be effective upon start-up of the new or modified equipment. Emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: PM 2.5

Upper Permit Limit: 448.3 tons per year



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Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-49: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-8.2**

**Item 1-49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

**Item 1-49.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to ensure emissions of PM-10 remain below the 15 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold, PM-10 emissions from the following sources shall be limited to 448.3 tons per year on a 12-month rolling basis:

- Modified Boiler 44 (ES 321AJ) operating under Process K14 and K20
- One Gas-fired Turbine and HRSG (ES 321BA/ 321BE operating under Process K21 and K22
- One new dual fueled MP Boiler (ES 321BK) operating under Process K23 and K24
- Three new gas-only HP Boilers (ES 321BL & 321BM & 321BN) operating under Process K24.

The record keeping requirements to demonstrate compliance with this annual limit shall be effective upon start-up of the new or modified equipment. Emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: PM-10

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Upper Permit Limit: 448.3 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-50: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-8.2**

**Item 1-50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 1-50.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to ensure emissions of Particulates remain below the 25 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold, Particulate emissions from the following sources shall be limited to 448.3 tons per year on a 12 month rolling basis:

- Modified Boiler 44 (ES 321AJ) operating under Process K14 and K20
- One Gas-fired Turbine and HRSG (ES 321BA/ 321BE) operating under Process K21 and K22
- One new Dual Fueled MP Boiler (ES321BK) operating under Process K23 and K24
- Three new Gas-only HP Boilers (ES321BL, 321BM and 321BN) operating under Process K24

The record keeping requirements to demonstrate compliance with the annual Particulate limit shall be effective upon start-up of the new or modified equipment. Particulate emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.



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Parameter Monitored: PARTICULATES  
Upper Permit Limit: 448.3 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-51: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 231-8.2**

**Item 1-51.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

**Item 1-51.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

In order to ensure emissions of carbon monoxide (CO) remain below the 100 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold, CO emissions from the following sources shall be limited to 250.0 tons per year on a 12-month rolling basis:

- Modified Boiler 44 (ES 321AJ) operating under Process K14 and K20
- One Gas-fired Turbine and HRSG (ES 321BA/ 321BE operating under Process K21 and K22
- One new dual fueled MP Boiler (ES 321BK) operating under Process K23 and K24
- Three new gas-only HP Boilers (ES 321BL & 321BM & 321BN) operating under Process K24.

The record keeping requirements to demonstrate compliance with this annual limit shall be effective upon start-up of the new or modified equipment. Emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.

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Parameter Monitored: CARBON MONOXIDE  
Upper Permit Limit: 250 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 139: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 139.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

**Item 139.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under Scenario 2, in order to ensure emissions of PM-10 remain below the 15 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold, project emissions shall be limited as follows:

Emissions of PM-10 from all sources included in the project: Package Boilers 1- 4 (ES 031AC - 031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES 321BB/ 321BF, ES 321BC/ 321BG), and dual fueled MP Boiler (ES 321BK); are limited to 96.5 tons per year on a 12-month rolling basis.

If Scenario 2 is implemented, the record keeping requirements to demonstrate compliance with this annual PM-10 limit shall be effective upon start-up of the new or modified equipment. PM-10 emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use data, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.

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Parameter Monitored: PM-10  
Upper Permit Limit: 96.5 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 140: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 140.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-02-5 PM 2.5

**Item 140.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under Scenario 2, in order to ensure emissions of PM 2.5 remain below the 10 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold, project emissions shall be limited as follows:

Emissions of Particulates from all sources included in the project: Package Boilers 1- 4 (ES 031AC - 031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES 321BB/ 321BF, ES 321BC/ 321BG), and dual fueled MP Boiler (ES 321BK); are limited to 86.7 tons per year on a 12-month rolling basis.

If Scenario 2 is implemented, the record keeping requirements to demonstrate compliance with this annual PM 2.5 limit shall be effective upon start-up of the new or modified equipment. PM 2.5 emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use data, operating records, and emission factors. Records shall be kept on site and made available

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to the Department upon request.

Parameter Monitored: PM 2.5

Upper Permit Limit: 86.7 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 141: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 141.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

**Item 141.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under Scenario 1, in order to ensure emissions of PM-10 remain below the 15 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold, project emissions shall be limited as follows:

Emissions of PM-10 from all sources included in the project: Package Boilers 1- 4 (ES 031AC - 031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Boiler 44 (ES 321AJ), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES 321BB/ 321BF, ES 321BC/ 321BG), dual fueled HP and MP Boilers (ES 321BJ, ES 321BK), and gas-only HP Boilers (ES 321BL & 321BM); are limited to 71.2 tons per year on a 12-month rolling basis.

If Scenario 1 is implemented, the record keeping requirements to demonstrate compliance with the annual PM-10 limit shall be effective upon start-up of the new or modified equipment. PM-10 emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done

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according to an approved monitoring plan, and will be based on fuel use, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: PM-10  
Upper Permit Limit: 71.2 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 142: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 142.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
CAS No: 0NY075-02-5 PM 2.5

**Item 142.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under Scenario 1, in order to ensure emissions of PM 2.5 remain below the 10 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold, project emissions shall be limited as follows:

Emissions of PM 2.5 from all sources included in the project: Package Boilers 1- 4 (ES 031AC - 031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Boiler 44 (ES 321AJ), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES 321BB/ 321BF, ES 321BC/ 321BG), dual fueled HP and MP Boilers (ES 321BJ, ES 321BK), and gas-only HP Boilers (ES 321BL & 321BM); are limited to 71.2 tons per year on a 12-month rolling basis.

If Scenario 1 is implemented, the record keeping requirements to demonstrate compliance with the annual PM 2.5 limit shall be effective upon start-up of the new or

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modified equipment. PM 2.5 emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: PM 2.5

Upper Permit Limit: 71.2 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 143: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 143.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

**Item 143.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under Scenario 2, in order to ensure emissions of carbon monoxide (CO) remain below the 100 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold under, project emissions shall be limited as follows:

Emissions of Carbon Monoxide from all sources included in the project: Package Boilers 1 - 4 (ES 031AC -031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES 321BB/ 321BF, ES 321BC/ 321BG), and dual fueled MP Boiler (ES 321BK); are limited to 207.0 tons per year on a 12-month rolling basis.

If Scenario 2 is implemented, the record keeping

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requirements to demonstrate compliance with this annual CO limit shall be effective upon start-up of the new or modified equipment. CO emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on Continuous Emission Monitors (CEMS) data, where available; fuel use and operating records; and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: CARBON MONOXIDE  
Upper Permit Limit: 207.0 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 144: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 144.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 144.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under Scenario 2, in order to ensure emissions of Particulates remain below the 25 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold, project emissions shall be limited as follows:

Emissions of Particulates from all sources included in the project: Package Boilers 1-4 (ES 031AC - 031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES 321BB/ 321BF, ES 321BC/ 321BG), and dual fueled MP Boiler (ES 321BK); are limited to 106.4 tons per year on a 12-month rolling basis.

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If Scenario 2 is implemented, the record keeping requirements to demonstrate compliance with this annual Particulates limit shall be effective upon start-up of the new or modified equipment. Particulate emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use data, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 106.4 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 145: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 145.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

**Item 145.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Under Scenario 1, in order to ensure emissions of carbon monoxide (CO) remain below the 100 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold under, project emissions shall be limited as follows:

Emissions of Carbon Monoxide from all sources included in the project: Package Boilers 1-4 (ES 031AC - 031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Boiler 44 (ES 321AJ), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES



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321BB/ 321BF, ES 321BC/ 321BG), dual fueled HP and MP Boilers (ES 321BJ, ES 321BK), and gas-only HP Boilers (ES 321BL & 321BM); are limited to 250.0 tons per year on a 12-month rolling basis.

If Scenario 1 is implemented, the record keeping requirements to demonstrate compliance with this annual CO limit shall be effective upon start-up of the new or modified equipment. CO emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on Continuous Emission Monitors (CEMS) data, where available; fuel use and operating records; and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: CARBON MONOXIDE  
Upper Permit Limit: 250.0 tons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 146: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 146.1:**  
The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 146.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:  
Under Scenario 1, in order to ensure emissions of Particulates remain below the 25 tpy Prevention of Significant Deterioration (PSD) significant net emission increase applicability threshold, project emissions shall be limited as follows:

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Emissions of Particulates from all sources included in the project: Package Boilers 1- 4 (ES 031AC - 031AF), Boiler 42 (ES 321AH), Boiler 43 (ES 321AI), Boiler 44 (ES 321AJ), Gas-fired Turbines and HRGS (ES 321BA/ 321BE, ES 321BB/ 321BF, ES 321BC/ 321BG), dual fueled HP and MP Boilers (ES 321BJ, ES 321BK), and gas-only HP Boilers (ES 321BL & 321BM); are limited to 71.2 tons per year on a 12-month rolling basis.

If Scenario 1 is implemented, the record keeping requirements to demonstrate compliance with the annual Particulate limit shall be effective upon start-up of the new or modified equipment. Particulate emissions shall be monitored and recorded on a monthly basis to be incorporated into a 12-month rolling total. Emission monitoring will be done according to an approved monitoring plan, and will be based on fuel use, operating records, and emission factors. Records shall be kept on site and made available to the Department upon request.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 71.2 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-52: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 52.21, Subpart A**

**Item 1-52.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

**Item 1-52.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with 40 CFR 52.21 Prevention of Significant Deterioration (PSD), carbon monoxide (CO) emissions from the combustion of bituminous coal in Boiler 44 (ES 321AJ) shall not exceed 0.03

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lb/mmbtu, as determined by applying emission factors to the heat input of the unit.

Monitoring Frequency: CONTINUOUS  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-53: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 52.21, Subpart A**

**Item 1-53.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 1-53.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In order to maintain compliance with 40 CFR 52.21 Prevention of Significant Deterioration (PSD), particulate emissions from the combustion of coal and No.2 fuel oil in Boiler 44 (ES 321AJ) shall not exceed 0.035 lb/mmBtu (as established in the initial PSD permit for this boiler). To demonstrate compliance with this particulate limit, a stack test shall be conducted once during the term of this permit. A stack test protocol shall be submitted to the Department according to the procedures of 6 NYCRR Part 202.

Upper Permit Limit: 0.035 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-54: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 60.42b(k)(2), NSPS Subpart Db**

**Replaces Condition(s) 150**

**Item 1-54.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 1-54.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

RED operates one (1) natural gas-fired Heat Recovery Steam Generating Unit (ES 321BE), one (1) new Dual fueled (natural gas and No.2 fuel oil) Boiler (321BK), and three (3) new natural gas-only Boilers (ES 321BL, 321BM and 321BN) which meet the exemption criteria in paragraph 60.42b(k)(2).

Units firing only very low sulfur oil that contains no more than 0.3 weight percent sulfur, gaseous fuel, a mixture of these fuels, or a mixture of these fuels with any other fuels with a potential SO<sub>2</sub> emission rate of 140 ng/J (0.32 lb/MMBtu) heat input or less are exempt from the Sulfur Dioxide emissions limit under 40 CFR 60.42b(k)(1).

RED shall demonstrate that the oil burned in the affected units meets the definition of very low sulfur oil by maintaining fuel receipts in accordance with the record keeping requirements of paragraph 60.49b(r)(1).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: OIL (NOT ELSEWHERE CLASSIFIED)

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.3 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 150: Compliance Certification**

**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.42b(k)(2), NSPS Subpart Db**

**Replaced by Condition(s) 1-54**

**Item 150.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 150.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

RED operates three (3) natural gas-fired Heat Recovery Steam Generating Units (ES 321BE, 321BF, 321BG), two (2) new Dual fueled (natural gas and No.2 fuel oil) Boilers (ES 321BJ, 321BK), and two (2) new natural gas-only Boilers (ES 321BL, 321BM) which meet the exemption criteria in paragraph 60.42b(k)(2).

Units firing only very low sulfur oil that contains no more than 0.3 weight percent sulfur, gaseous fuel, a mixture of these fuels, or a mixture of these fuels with any other fuels with a potential SO<sub>2</sub> emission rate of 140 ng/J (0.32 lb/MMBtu) heat input or less are exempt from the Sulfur Dioxide emissions limit under 40 CFR 60.42b(k)(1).

RED shall demonstrate that the oil burned in the affected units meets the definition of very low sulfur oil by maintaining fuel receipts in accordance with the record keeping requirements of paragraph 60.49b(r)(1).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: OIL (NOT ELSEWHERE CLASSIFIED)

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.3 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY  
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-55: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 60.49b(g), NSPS Subpart Db**

**Replaces Condition(s) 154**

**Item 1-55.1:**

The Compliance Certification activity will be performed for:



Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-55.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For the one new gas turbine/HRSG (ES 321BA/321BE) and four new boilers (321BK, 321BL, 321BM 321BN) subject to NO<sub>x</sub> standards, RED shall maintain records of the following information for each steam generating unit operating day:

- 1) Calendar date.
- 2) The average hourly nitrogen oxides emission rates (expressed as NO<sub>2</sub>) (ng/J or lb/million Btu heat input) measured or predicted.
- 3) The 30-day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceeding 30 steam generating unit operating days.
- 4) Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emission standards under 40CFR60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.
- 5) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.
- 6) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.
- 7) Identification of the "F" factor used for calculations, method of determination, and type of fuel combusted.
- 8) Identification of the times when the pollutant concentration exceeded the full span of the continuous monitoring system.
- 9) Description of any modifications to the continuous monitoring system that could affect the ability of the system to comply with Performance Specification 2 or 3.
- 10) Results of daily CEMS drift tests and quarterly accuracy assessments as required under 40CFR60 Appendix F,



Procedure 1.

To satisfy the requirements of subdivision 60.49b(i), for the applicable units subject to continuous monitoring requirements for NO<sub>x</sub>, RED shall submit quarterly reports containing the above listed information. This report may be combined and submitted along with the quarterly Part 227 excess emissions report.

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of 2 years following the date of such record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 154: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.49b(g), NSPS Subpart Db**

**Replaced by Condition(s) 1-55**

**Item 154.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 154.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For the three new gas turbine/HRSGs (ES 321BA/321BE, ES 321BB/321BF, ES321BC/321BG) and four new boilers (ES 321BJ, 321BK, 321BL, 321BM) subject to NO<sub>x</sub> standards, RED shall maintain records of the following information for each steam generating unit operating day:

- 1) Calendar date.
- 2) The average hourly nitrogen oxides emission rates (expressed as NO<sub>2</sub>) (ng/J or lb/million Btu heat input) measured or predicted.
- 3) The 30-day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the



measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.

4) Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emission standards under 40CFR60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.

5) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.

6) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.

7) Identification of the "F" factor used for calculations, method of determination, and type of fuel combusted.

8) Identification of the times when the pollutant concentration exceeded the full span of the continuous monitoring system.

9) Description of any modifications to the continuous monitoring system that could affect the ability of the system to comply with Performance Specification 2 or 3.

10) Results of daily CEMS drift tests and quarterly accuracy assessments as required under 40CFR60 Appendix F, Procedure 1.

To satisfy the requirements of subdivision 60.49b(i), for the applicable units subject to continuous monitoring requirements for NO<sub>x</sub>, RED shall submit quarterly reports containing the above listed information. This report may be combined and submitted along with the quarterly Part 227 excess emissions report.

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of 2 years following the date of such record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-56: Compliance Certification  
Effective for entire length of Permit**



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**Applicable Federal Requirement:40CFR 60.49b(h), NSPS Subpart Db**

**Replaces Condition(s) 155**

**Item 1-56.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-56.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For RED's one gas turbine/HRSG (ES 321BA/321BE) and four new boilers (321BK, 321BL, 321BM, 321BN) quarterly reports shall be submitted in accordance with the requirements of Subdivision 60.49b(h). RED shall submit quarterly excess emission reports for opacity and oxides of nitrogen (NOx) for any reporting period during which there are excess emissions from the affected facility. This report may be combined and submitted along with the quarterly Part 227 excess emissions reports.

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of 2 years following the date of such record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 155: Compliance Certification**

**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.49b(h), NSPS Subpart Db**

**Replaced by Condition(s) 1-56**

**Item 155.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 155.2:**

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For RED's three new gas turbine/HRSGs (ES 321BA/321BE, ES 321BB/321BF, ES321BC/321BG) and four new boilers (ES 321BJ, 321BK, 321BL, 321BM) quarterly reports shall be submitted in accordance with the requirements of Subdivision 60.49b(h). RED shall submit quarterly excess emission reports for opacity and oxides of nitrogen (NOx) for any reporting period during which there are excess emissions from the affected facility. This report may be combined and submitted along with the quarterly Part 227 excess emissions reports.

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of 2 years following the date of such record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 156: Compliance Certification**

**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 63.7495(a), Subpart DDDDD**

**Expired by Mod 1**

**Item 156.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00015

Process: K23

Emission Source: 321BJ

Emission Unit: U-00015

Process: K23

Emission Source: 321BK

Emission Unit: U-00015

Process: K24

Emission Source: 321BJ

Emission Unit: U-00015

Process: K24

Emission Source: 321BK

Emission Unit: U-00015

Process: K24

Emission Source: 321BL

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Emission Unit: U-00015

Process: K24

Emission Source: 321BM

**Item 156.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a new or reconstructed boiler or process heater must comply with subpart DDDDD by January 31, 2013 or upon startup of the boiler or process heater, whichever is later.

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-57: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63.7495(b), Subpart DDDDD**

**Item 1-57.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 1-57.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities that are major sources of hazardous air pollutants (HAPs) that have existing industrial, commercial or institutional boilers must comply with 40 CFR 63 Subpart DDDDD by January 31, 2016, except as provided in 40 CFR 63.6(i)(4)(i)(A) elsewhere in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 164: Good air pollution control practices  
Effective between the dates of 01/31/2017 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 63.7500(a)(3), Subpart DDDDD**

**Replaced by Condition(s) 1-12**

**Item 164.1:**

This Condition applies to:

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Emission Unit: U00015  
Process: K12

Emission Unit: U00015  
Process: K13

Emission Unit: U00015  
Process: K14

Emission Unit: U00015  
Process: K16

**Item 164.1:**

This Condition applies to Emission Unit: U-00015

**Item 164.2.3:**

At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**Condition 168: Demonstrating Compliance**

**Effective between the dates of 01/31/2017 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 63.7505(c), Subpart DDDDD**

**Replaced by Condition(s) 1-13**

**Item 168.1:**

This Condition applies to:

Emission Unit: U00015  
Process: K14

Emission Unit: U00015  
Process: K16

**Item 168.1:**

This Condition applies to Emission Unit: U-00015

**Item 168.2.3:**

The owner or operator of an industrial, commercial, or institutional boiler located at a major source of HAP must demonstrate compliance with all applicable emission limits using performance stack testing, fuel analysis, or continuous monitoring systems (CMS), including a continuous emission



monitoring system (CEMS), continuous opacity monitoring system (COMS), continuous parameter monitoring system (CPMS), or particulate matter continuous parameter monitoring system (PM CPMS), where applicable. The owner or operator may demonstrate compliance with the applicable emission limit for hydrogen chloride (HCl), mercury, or total selected metals (TSM) using fuel analysis if the emission rate calculated according to 40 CFR 63.7530(c) is less than the applicable emission limit. (For gaseous fuels, the owner or operator may not use fuel analyses to comply with the TSM alternative standard or the HCl standard.) Otherwise, the owner or operator must demonstrate compliance for HCl, mercury, or TSM using performance testing, if subject to an applicable emission limit listed in Tables 1, 2, or 11 through 13 to subpart DDDDD.

**Condition 1-58: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.7530(a), Subpart DDDDD**

**Item 1-58.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

**Item 1-58.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility must demonstrate initial compliance with each emission limit that applies to the facility by conducting initial performance tests and fuel analyses and establishing operating limits, as applicable, according to §63.7520, paragraphs (b) and (c) of this section, and Tables 5 and 7 to this subpart. The requirement to conduct a fuel analysis is not applicable for units that burn a single type of fuel, as specified by §63.7510(a)(2)(i). If applicable, facility must also install, operate, and maintain all applicable CMS (including CEMS, COMS, and CPMS) according to §63.7525.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 187: Notification of compliance status**

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**Effective between the dates of 01/31/2017 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 63.7545(e), Subpart DDDDD**

**Replaced by Condition(s) 1-20**

**Item 187.1:**

This Condition applies to:

Emission Unit: U00015  
Process: K14

Emission Unit: U00015  
Process: K16

**Item 187.1:**

This Condition applies to Emission Unit: U-00015

**Item 187.2.3:**

Owners and operators that are required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530 must submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii). For the initial compliance demonstration for each affected source, the owner or operator must submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of all performance test and/or other initial compliance demonstrations for the affected source according to 40 CFR 63.10(d)(2). The Notification of Compliance Status report must contain all the information specified in 40 CFR 63.7545(e)(1) through (8), as applicable.

**Condition 200: General Provisions**

**Effective between the dates of 01/31/2017 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 63.7565, Subpart DDDDD**

**Expired by Mod 1**

**Item 200.1:**

This Condition applies to:

Emission Unit: U00015  
Process: K14

Emission Unit: U00015  
Process: K16

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**Condition 1-59: Compliance Certification**

**Effective for entire length of Permit**

**Applicable Federal Requirement:40 CFR Part 64**



**Replaces Condition(s) 201**

**Item 1-59.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-59.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

For the purposes of demonstrating compliance with the 6 NYCRR Part 227-1.2(a)(4) particulate limits of 0.26 lb/mmbtu for Boiler 42 (ES 321AH/ EP 00003), Compliance Assurance Monitoring Rule (CAM) requirements apply in accordance with the CAM Plan, dated April 21, 2015 (or more recent plan approved by the Department). Opacity shall be measured by the continuous opacity monitoring system

(COMS) at the outlet of the Boiler 42 ESP (Control Device 32104). The COMS shall be operated, calibrated and maintained in accordance with QA/QC requirements in 40 CFR Part 60 Appendix B. This breeching COM data shall be used as an indicator of compliance with the particulate limit as demonstrated by the most recent stack test completed in August 2007. Based on these test results, an excursion is defined as an opacity value (3-hour block average of 6 minute data averages) greater than 10.1%, except during periods of startup, shutdown, and malfunction.

**Response to Excursions**

In the event that an opacity excursion occurs, the control equipment and breeching COMS shall be inspected and necessary repairs initiated, as appropriate. The boiler combustion parameters and ESP operating parameters will be evaluated and the following corrective actions will be taken:

1. Reduce boiler load as possible to achieve compliance with one-hour opacity average.
2. Make on-line repairs to units as necessary and re-evaluate system functionality.
3. In the event that full system functionality cannot be restored, the unit will be shut down and repaired as soon as plant loading conditions permit.

If continued accumulation of excursions exceeds 5 percent of breeching opacity COM data (averaged over a 3-hour

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block period, excluding startup and shutdown periods) recorded in a calendar quarter, a Quality Improvement Plan (QIP) will be implemented as set forth in the CAM Plan and 40 CFR 64.8. As an initial step of the QIP, additional stack testing shall be performed within the time specified by the Department to demonstrate compliance with the particulate standard and/or establish a basis for adjustment of the breaching opacity limit, as necessary.

Regardless of whether a QIP is implemented, particulate emissions testing to re-establish the compliance indicator shall be conducted at least once during the term of the permit (i.e. prior to application for Title V Permit Renewal). A test notification and protocol shall be submitted 30 days prior to a planned test date. A test report shall be submitted to the Department within 60 days of completing testing along with the proposed compliance indicator(s).

#### Record keeping

The operator shall maintain records in accordance with 40 CFR 64.9(b). All data required for compliance with this condition shall be kept on site and made available to the Department upon request.

#### Reporting

Pursuant to 40 CFR 64.9(a), reports of excursions, COM downtime incidents, and implementation of a QIP shall be included in the Title V Semi-Annual Monitoring Deviation Reports. For each excursion or COM downtime incident, these reports shall include the measured opacity, duration, cause (including unknown cause, if applicable), and the corrective actions taken. If necessary, the reports shall also include a description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the operator shall include in the next report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions occurring.

Manufacturer Name/Model Number: PHOENIX INSTRUMENTS OPAC 20/20

Parameter Monitored: OPACITY

Upper Permit Limit: 10.1 percent

Reference Test Method: METHOD 9

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.





Subsequent reports are due every 6 calendar month(s).

**Condition 1-60: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40 CFR Part 64**

**Replaces Condition(s) 202**

**Item 1-60.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-60.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

For the purposes of demonstrating compliance with the 6 NYCRR Part 227-1.2(a)(4) particulate limit of 0.24 lb/mmbtu for Boiler 43 (ES 321AI/ EP 00004), Compliance Assurance Monitoring Rule (CAM) requirements apply in accordance with the CAM Plan, dated April 21, 2015 (or more recent plan approved by the Department). Opacity shall be measured by the continuous opacity monitoring system (COMS) at the outlet of the Boiler 43 ESP (Control Device 32101). The COMS shall be operated, calibrated and maintained in accordance with QA/QC requirements in 40 CFR Part 60 Appendix B. This breeching COM data shall be used as an indicator of compliance with the particulate limit as demonstrated by the most recent stack test completed in August 2007. Based on these test results, an excursion is defined as an opacity value (3-hour block average of 6 minute data averages) greater than 9.6%, except during periods of startup, shutdown, and malfunction.

**Response to Excursions**

In the event that an opacity excursion occurs, the control equipment and breeching COMS shall be inspected and necessary repairs initiated, as appropriate. The boiler combustion parameters and ESP operating parameters will be evaluated and the following corrective actions will be taken:

1. Reduce boiler load as possible to achieve compliance with one-hour opacity average.
2. Make on-line repairs to units as necessary and re-evaluate system functionality.



3. In the event that full system functionality cannot be restored, the unit will be shut down and repaired as soon as plant loading conditions permit.

If continued accumulation of excursions exceeds 5 percent of breaching opacity COM data (averaged over a 3-hour block period, excluding startup and shutdown periods) recorded in a calendar quarter, a Quality Improvement Plan (QIP) will be implemented as set forth in the CAM Plan and 40 CFR 64.8. As an initial step of the QIP, additional stack testing shall be performed within the time specified by the Department to demonstrate compliance with the particulate standard and/or establish a basis for adjustment of the breaching opacity limit, as necessary.

Regardless of whether a QIP is implemented, particulate emissions testing to re-establish the compliance indicator shall be conducted at least once during the term of the permit (i.e. prior to application for Title V Permit Renewal). A test notification and protocol shall be submitted 30 days prior to a planned test date. A test report shall be submitted to the Department within 60 days of completing testing along with the proposed compliance indicator(s).

#### Record keeping

The operator shall maintain records in accordance with 40 CFR 64.9(b). All data required for compliance with this condition shall be kept on site and made available to the Department upon request.

#### Reporting

Pursuant to 40 CFR 64.9(a), reports of excursions, COM downtime incidents, and implementation of a QIP shall be included in the Title V Semi-Annual Monitoring Deviation Reports. For each excursion or COM downtime incident, these reports shall include the measured opacity, duration, cause (including unknown cause, if applicable), and the corrective actions taken. If necessary, the reports shall also include a description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the operator shall include in the next report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions occurring.

Manufacturer Name/Model Number: PHOENIX INSTRUMENTS OPAC 20/20  
Parameter Monitored: OPACITY

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Upper Permit Limit: 9.6 percent  
Reference Test Method: METHOD 9  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 3-HOUR BLOCK AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-61: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40 CFR Part 64**

**Item 1-61.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 1-61.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

For the purpose of demonstrating compliance with the particulate limit of 0.035 lb/mmbtu for Boiler 44 (ES 321AJ/ EP 00004) established under 40 CFR 52.21 Prevention of Significant Deterioration (PSD), Compliance Assurance Monitoring Rule (CAM) requirements apply in accordance with the CAM Plan, effective September 2009 (or more recent plan approved by the Department). Opacity shall be measured by the continuous opacity monitoring system

(COMS) at the outlet of the Boiler 44 ESP (Control Device 32103). The COMS shall be operated, calibrated and maintained in accordance with QA/QC requirements in 40 CFR Part 60 Appendix B. This breeching COM data shall be used as an indicator of compliance with the particulate limit as demonstrated by the most recent stack test completed in November 2009. Based on these test results, an excursion is defined as an opacity value (3-hour block average of 6 minute data averages) greater than 9.0%, except during periods of startup, shutdown, and malfunction.

**Response to Excursions**

In the event that an opacity excursion occurs, the control equipment and breeching COMS shall be inspected and necessary repairs initiated, as appropriate. The boiler combustion parameters and ESP operating parameters will be



evaluated and the following corrective actions will be taken:

1. Reduce boiler load as possible to achieve compliance with one-hour opacity average.
2. Make on-line repairs to units as necessary and re-evaluate system functionality.
3. In the event that full system functionality cannot be restored, the unit will be shut down and repaired as soon as plant loading conditions permit.

If continued accumulation of excursions exceeds 5 percent of breaching opacity COM data (averaged over a 3-hour block period, excluding startup and shutdown periods) recorded in a calendar quarter, a Quality Improvement Plan (QIP) will be implemented as set forth in the CAM Plan and 40 CFR 64.8. As an initial step of the QIP, additional stack testing shall be performed within the time specified by the Department to demonstrate compliance with the particulate standard and/or establish a basis for adjustment of the breaching opacity limit, as necessary.

Regardless of whether a QIP is implemented, particulate emissions testing to re-establish the compliance indicator shall be conducted at least once during the term of the permit (i.e. prior to application for Title V Permit Renewal). A test notification and protocol shall be submitted 30 days prior to a planned test date. A test report shall be submitted to the Department within 60 days of completing testing along with the proposed compliance indicator(s).

#### Record keeping

The operator shall maintain records in accordance with 40 CFR 64.9(b). All data required for compliance with this condition shall be kept on site and made available to the Department upon request.

#### Reporting

Pursuant to 40 CFR 64.9(a), reports of excursions, COM downtime incidents, and implementation of a QIP shall be included in the Title V Semi-Annual Monitoring Deviation Reports. For each excursion or COM downtime incident, these reports shall include the measured opacity, duration, cause (including unknown cause, if applicable), and the corrective actions taken. If necessary, the reports shall also include a description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the operator shall include in the next report documentation that the implementation of the plan has been completed and reduced

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the likelihood of similar levels of excursions occurring.

Manufacturer Name/Model Number: PHOENIX INSTRUMENTS OPAC 20/20  
Parameter Monitored: OPACITY  
Upper Permit Limit: 9.0 percent  
Reference Test Method: METHOD 9  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 3-HOUR BLOCK AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 201: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-59**

**Item 201.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 201.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

For the purposes of demonstrating compliance with the 6 NYCRR Part 227-1.2(a)(4) particulate limits of 0.26 lb/mmbtu for Boiler 42 (ES 321AH/ EP 00003), Compliance Assurance Monitoring Rule (CAM) requirements apply in accordance with the CAM Plan, dated September 15, 2007 (or more recent plan approved by the Department). Opacity shall be measured by the continuous opacity monitoring system (COMS) at the outlet of the Boiler 42 ESP (Control Device 32104). The COMS shall be operated, calibrated and maintained in accordance with QA/QC requirements in 40 CFR Part 60 Appendix B. This breaching COM data shall be used as an indicator of compliance with the particulate limit as demonstrated by the most recent stack test completed in August 2007. Based on these test results, an excursion is defined as an opacity value (3-hour block average of 6 minute data averages) greater than 14.0%, except during periods of startup, shutdown, and malfunction.



#### Response to Excursions

In the event that an opacity excursion occurs, the control equipment and breeching COMS shall be inspected and necessary repairs initiated, as appropriate. The boiler combustion parameters and ESP operating parameters will be evaluated and the following corrective actions will be taken:

1. Reduce boiler load as possible to achieve compliance with one-hour opacity average.
2. Make on-line repairs to units as necessary and re-evaluate system functionality.
3. In the event that full system functionality cannot be restored, the unit will be shut down and repaired as soon as plant loading conditions permit.

If continued accumulation of excursions exceeds 5 percent of breeching opacity COM data (averaged over a 3-hour block period, excluding startup and shutdown periods) recorded in a calendar quarter, a Quality Improvement Plan (QIP) will be implemented as set forth in the CAM Plan and 40 CFR 64.8. As an initial step of the QIP, additional

stack testing shall be performed within the time specified by the Department to demonstrate compliance with the particulate standard and/or establish a basis for adjustment of the breeching opacity limit, as necessary.

Regardless of whether a QIP is implemented, particulate emissions testing to re-establish the compliance indicator shall be conducted at least once during the term of the permit (i.e. prior to application for Title V Permit Renewal). A test notification and protocol shall be submitted 30 days prior to a planned test date. A test report shall be submitted to the Department within 60 days of completing testing along with the proposed compliance indicator(s).

#### Record keeping

The operator shall maintain records in accordance with 40 CFR 64.9(b). All data required for compliance with this condition shall be kept on site and made available to the Department upon request.

#### Reporting

Pursuant to 40 CFR 64.9(a), reports of excursions, COM downtime incidents, and implementation of a QIP shall be included in the Title V Semi-Annual Monitoring Deviation Reports. For each excursion or COM downtime incident, these reports shall include the measured opacity, duration, cause (including unknown cause, if applicable), and the

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corrective actions taken. If necessary, the reports shall also include a description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the operator shall include in the next report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions occurring.

Manufacturer Name/Model Number: PHOENIX INSTRUMENTS OPAC 20/20  
Parameter Monitored: OPACITY  
Upper Permit Limit: 14.0 percent  
Reference Test Method: METHOD 9  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 3-HOUR BLOCK AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 202: Compliance Certification**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-60**

**Item 202.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 202.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

For the purposes of demonstrating compliance with the 6 NYCRR Part 227-1.2(a)(4) particulate limit of 0.24 lb/mmbtu for Boiler 43 (ES 321AI/ EP 00004), Compliance Assurance Monitoring Rule (CAM) requirements apply in accordance with the CAM Plan, dated September 15, 2007 (or more recent plan approved by the Department). Opacity shall be measured by the continuous opacity monitoring system (COMS) at the outlet of the Boiler 43 ESP (Control Device 32101). The COMS shall be operated, calibrated and maintained in accordance with QA/QC requirements in 40 CFR Part 60 Appendix B. This breeching COM data shall be used



an indicator of compliance with the particulate limit as demonstrated by the most recent stack test completed in August 2007. Based on these test results, an excursion is defined as an opacity value (3-hour block average of 6 minute data averages) greater than 13.5%, except during periods of startup, shutdown, and malfunction.

#### Response to Excursions

In the event that an opacity excursion occurs, the control equipment and breeching COMS shall be inspected and necessary repairs initiated, as appropriate. The boiler combustion parameters and ESP operating parameters will be evaluated and the following corrective actions will be taken:

1. Reduce boiler load as possible to achieve compliance with one-hour opacity average.
2. Make on-line repairs to units as necessary and re-evaluate system functionality.
3. In the event that full system functionality cannot be restored, the unit will be shut down and repaired as soon as plant loading conditions permit.

If continued accumulation of excursions exceeds 5 percent of breeching opacity COM data (averaged over a 3-hour block period, excluding startup and shutdown periods) recorded in a calendar quarter, a Quality Improvement Plan (QIP) will be implemented as set forth in the CAM Plan and 40 CFR 64.8. As an initial step of the QIP, additional

stack testing shall be performed within the time specified by the Department to demonstrate compliance with the particulate standard and/or establish a basis for adjustment of the breeching opacity limit, as necessary.

Regardless of whether a QIP is implemented, particulate emissions testing to re-establish the compliance indicator shall be conducted at least once during the term of the permit (i.e. prior to application for Title V Permit Renewal). A test notification and protocol shall be submitted 30 days prior to a planned test date. A test report shall be submitted to the Department within 60 days of completing testing along with the proposed compliance indicator(s).

#### Record keeping

The operator shall maintain records in accordance with 40 CFR 64.9(b). All data required for compliance with this condition shall be kept on site and made available to the Department upon request.



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**Reporting**

Pursuant to 40 CFR 64.9(a), reports of excursions, COM downtime incidents, and implementation of a QIP shall be included in the Title V Semi-Annual Monitoring Deviation Reports. For each excursion or COM downtime incident, these reports shall include the measured opacity, duration, cause (including unknown cause, if applicable), and the corrective actions taken. If necessary, the reports shall also include a description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the operator shall include in the next report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions occurring.

Manufacturer Name/Model Number: PHOENIX INSTRUMENTS OPAC 20/20  
Parameter Monitored: OPACITY  
Upper Permit Limit: 13.5 percent  
Reference Test Method: METHOD 9  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 3-HOUR BLOCK AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2016.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-62: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-1.2 (a) (1)**

**Item 1-62.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015  
Process: K07

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 1-62.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Particulate emissions from each of the Package Boilers 1, 2, 3 and 4 (ES 031AC, 031AD, 031AE, 031AF) shall not exceed 0.10 lb/mmbtu, based on the combined heat input of the four boilers ducted to a common stack (EP 00001). In

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order to ensure compliance with the particulate limit, annual tune-ups shall be performed on each boiler. Records of maintenance and tune-ups shall be kept on site and made available to the Department upon request.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-63: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-2.5 (c)**

**Item 1-63.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015  
Process: K07

Regulated Contaminant(s):  
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-63.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In order to comply with the Subpart 227-2 NO<sub>x</sub> RACT requirements, the Package Boilers 1, 2, 3 and 4 (ES 031AC, 031AD, 031AE, 031AF) are each limited to 200,000 gallons of residual oil use per year, on a twelve month rolling basis. The amount of fuel burned in these units must be recorded within +/-5% accuracy and shall be incorporated into a 12-month rolling total. Within 30 days of the end of each calendar year, RED shall submit a report to the Department showing the 12-month rolling total fuel oil consumption for each of the four package boilers during each month of that previous year. The Part 227-2.5(c) federally enforceable limit of 200,000 gallons of residual oil used per year ( $3.0 \times 10^4$  mmbtu/year per boiler) for each of the Package Boilers #1-4 (ES 031AC, 031AD, 031AE, 031AF and EP 00001) is more stringent than Boiler MACT limited use 10% annual capacity factor ( $8.5 \times 10^4$  mmbtu/year per boiler) By complying with the Part 227-2.5(c) fuel use record keeping requirements of this condition, RED is also satisfying the Boiler MACT Limited Use 10% annual capacity record keeping requirements.

Work Practice Type: PROCESS MATERIAL THRUPUT

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Process Material: NUMBER 6 OIL  
Upper Permit Limit: 200000 gallons per year  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-64: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-2.5 (c)**

**Replaces Condition(s) 206**

**Item 1-64.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015  
Process: K07

Regulated Contaminant(s):  
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-64.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In order to comply with the Subpart 227-2 NO<sub>x</sub> RACT requirements, NO<sub>x</sub> emissions from each of the Package Boilers 1, 2, 3 and 4 (ES 031AC, 031AD, 031AE, 031AF) shall not exceed 0.57 lb/mmBtu based on a one hour average. This source-specific limit is based on the most recent RACT analysis (dated December 2011, revised January 13, 2015, revised August 15, 2016), conducted in accordance with the provisions of Section 225-2.5, which demonstrated that compliance with the applicable presumptive RACT emission limit in Section 227-2.4 is not economically feasible.

Parameter Monitored: OXIDES OF NITROGEN  
Upper Permit Limit: 0.57 pounds per million Btus  
Reference Test Method: Method 7E  
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT  
Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 206: Compliance Certification**

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**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Replaced by Condition(s) 1-64**

**Item 206.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K07

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 206.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In order to comply with the Subpart 227-2 NO<sub>x</sub> RACT requirements, NO<sub>x</sub> emissions from each of the Package Boilers 1, 2, 3 and 4 (ES 031AC, 031AD, 031AE, 031AF) shall not exceed 0.57 lb/mmbtu based on a one hour average. This source-specific limit is based on the most recent RACT analysis (dated December 2011, revised January 13, 2015), conducted in accordance with the provisions of Section 225-2.5, which demonstrated that based on the limited remaining life of these boilers, compliance with the applicable presumptive RACT emission limit in Section 227-2.4 is not economically feasible. These package boilers are expected to operate until January 2018. No later than 6 months from the expected shut down date, RED must notify the Department of the scheduled shut down of these boilers, or submit a NO<sub>x</sub> RACT compliance plan within 90 days.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 0.57 pounds per million Btus

Reference Test Method: Method 7E

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-65: Compliance Certification**  
**Effective for entire length of Permit**

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**Applicable Federal Requirement:40CFR 63.7500(c), Subpart DDDDD**

**Item 1-65.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K07

**Item 1-65.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Limited-use boilers and process heaters must complete a tune-up every 5 years as specified in 40 CFR 63.7540.

Limited-use boilers are not subject to the emission limits in 40 CFR Part 63, Subpart DDDDD, Tables 1 and 2 or 11 through 13, the annual tune-up, the energy assessment requirements in Table3, or the operating limits in Table 4.

The owner or operator shall keep fuel use records for the days the boiler or process heater was operating.

On an annual calendar year basis, the owner or operator shall demonstrate compliance with this requirement.

The initial Report is due 1-30-2016

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-66: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 227-2.4 (a) (2)**

**Item 1-66.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K13

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-66.2:**

Compliance Certification shall include the following monitoring:

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Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

In order to comply with Subpart Part 227-2 NOx RACT requirements, NOx emissions from each Boiler 42 (ES 321AH) and Boiler 43 (ES 321AI) are limited to 0.6 lb/mmBtu.

Compliance with these limits will be demonstrated through the use of a continuous monitoring system according to the requirements of Part 227-2.6. Emission limits are based on a 24 hour average during the ozone season and a 30-day rolling average during the non-ozone season.

Manufacturer Name/Model Number: TECO 42

Upper Permit Limit: 0.6 pounds per million Btus

Reference Test Method: Method 7E

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-67: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 227-1.2 (a) (4)**

**Item 1-67.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K13

Emission Source: 321AH

Regulated Contaminant(s):

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**Item 1-67.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 227-1.2(a)(4), particulate emissions from Boiler 42 (ES 321AH) are limited to 0.25 lb/mmBtu, based on a maximum heat input capacity of 500 mmBtu/hr. To demonstrate compliance with the particulate limit, a stack test shall be conducted once during the term of the permit. A stack test protocol shall be submitted to the Department according to the procedures of 6 NYCRR Part 202.

Upper Permit Limit: 0.25 pounds per million Btus

Reference Test Method: Method 5



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**Applicable Federal Requirement:6 NYCRR 227-1.2 (a) (4)**

**Item 1-69.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K13

Emission Source: 321AI

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-69.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In order to maintain compliance with 6 NYCRR Part 227-1.2(a)(4), particulate emissions from Boiler 43 (ES 321AI) are limited to 0.24 lb/mmBtu, based on a maximum heat input capacity of 640 mmBtu/hr. To demonstrate compliance with the particulate limit, a stack test shall be conducted once during the term of the permit. A stack test protocol shall be submitted to the Department according to the procedures of 6 NYCRR Part 202.

Upper Permit Limit: 0.24 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-70: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR Subpart 231-10**

**Item 1-70.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K13

Emission Source: 321AI

Regulated Contaminant(s):

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**Item 1-70.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE



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**Monitoring Description:**

In order to establish Emission Reduction Credits (ERCs), as defined in 6 NYCRR Part 231, the use of coal-fired Boiler #43 (ES 321AI/ EP 00004) will be limited to its 10% annual capacity factor, or  $5.6 \times 10^5$  mmbtu/yr. This 10% annual capacity factor also qualifies ES 321AI/EP 00004 as a limited-use boiler as defined in 40 CFR 63 Subpart DDDDD Boiler MACT.

Records of the hours of operation and fuel use shall be kept in order to calculate the total heat input on a monthly basis. Each month, the twelve month rolling total heat input for Boiler 43 must be calculated to demonstrate compliance with the 10% annual capacity factor of  $5.6 \times 10^5$  mmbtu/yr. These records shall be kept on site and made available to the Department upon request.

Parameter Monitored: HOURS OF OPERATION

Upper Permit Limit: 560000 million British thermal units  
per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 211: Compliance Certification**

**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:**

**Expired by Mod 1**

**Item 211.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K13

Emission Source: 321AI

Regulated Contaminant(s):

CAS No: ONY210-00-0 OXIDES OF NITROGEN

**Item 211.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

**Monitoring Description:**

In order to establish Emission Reduction Credits (ERCs), as defined in 6 NYCRR Part 231, the use of coal-fired Boiler #43 (ES 321AI/ EP 00004) under Scenario 2 will be limited to its 10% annual capacity factor, or  $5.6 \times 10^5$

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mmbtu/yr. This 10% annual capacity factor also qualifies ES 321AI/EP 00004 as a limited-use boiler as defined in 40 CFR 63 Subpart DDDDD Boiler MACT.

Records of the hours of operation and fuel use shall be kept in order to calculate the total heat input on a monthly basis. Each month, the twelve month rolling total heat input for Boiler 43 must be calculated to demonstrate compliance with the 10% annual capacity factor of  $5.6 \times 10^5$  mmbtu/yr. These records shall be kept on site and made available to the Department upon request.

Parameter Monitored: HOURS OF OPERATION

Upper Permit Limit: 560000 million British thermal units  
per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-71: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.7500(a)(3), Subpart DDDDD**

**Item 1-71.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K13

Emission Source: 321AI

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-71.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The use of coal-fired Boiler #43 (ES321AI/EP 00004) will be limited to its 10% annual capacity factor, or  $5.6 \times 10^5$  mmbtu/yr. This 10% annual capacity factor also qualifies ES 321AI/EP 00004 as a limited-use boiler as defined in 40 CFR 63 Subpart DDDDD Boiler MACT.

Records of the hours of operation and fuel use shall be kept in order to calculate the total heat input on a monthly basis. Each month, the twelve month rolling total

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heat input for Boiler 43 must be calculated to demonstrate compliance with the 10% annual capacity factor of  $5.6 \times 10^5$  mmbtu/yr. These records shall be kept on site and made available to the Department upon request.

Initial report is due 1-30-2016

Work Practice Type: HOURS PER MONTH OPERATION  
Parameter Monitored: OXIDES OF NITROGEN  
Upper Permit Limit: 560000 hours  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-72: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 52.21, Subpart A**

**Item 1-72.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015  
Process: K14

Regulated Contaminant(s):  
CAS No: 000630-08-0 CARBON MONOXIDE

**Item 1-72.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to demonstrate compliance with 40 CFR 52.21 Prevention of Significant Deterioration (PSD), carbon monoxide (CO) emissions from the combustion of No.2 fuel oil in Boiler 44 (ES 321AJ) shall not exceed the CO significance threshold on a 12-month rolling basis when calculated using the AP-42 factor of 5 lbs CO/1000 gal No.2 fuel oil and the number of gallons of fuel burned each month.

Monitoring Frequency: MONTHLY  
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-73: Compliance Certification**  
**Effective for entire length of Permit**



**Applicable Federal Requirement:40CFR 63.7500(a)(1), Subpart DDDDD**

**Item 1-73.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K14

Regulated Contaminant(s):

CAS No: 0NY507-00-0

40 CFR 63 SUBPART DDDDD TOTAL SELECTED METALS

**Item 1-73.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of an existing industrial, commercial, or institutional light liquid fuel-fired boiler with heat input capacity of 10 million Btu per hour or greater located at a major source of HAP emissions must limit the concentration of total selected metal (TSM) emissions. TSM consists of the sum of the following metallic hazardous air pollutants: arsenic, beryllium, cadmium, chromium, lead, manganese, nickel, and selenium.

The concentration limit for TSM is 0.000062 lb/mmBtu of heat input or less based on the average of three runs. Each run must collect a minimum of three dry standard cubic meters.

The performance stack test must be conducted at the representative operating load conditions while burning the type of fuel or mixture of fuels that have the highest emissions potential for each regulated pollutant. The owner or operator of an industrial, commercial, or institutional boiler that demonstrates compliance with a performance stack test must maintain the operating load of each unit such that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance stack test.

The facility must also meet the applicable operating limits listed in table 4 of subpart DDDDD.

Initial compliance will be demonstrated according to the provisions in 40 CFR 63.7530.

Subsequent performance tests will be required as specified in 40 CFR 63.7515, which requires performance tests to be



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conducted on an annual basis, no more than 13 months after the previous performance test. Testing can be reduced if the requirements in 40 CFR 63.7515 are followed.

Continuous compliance will then be demonstrated according to 40 CFR 63.7540. The facility must submit notifications and reports and keep records and according to the provisions in 40 CFR 63.7545, 7550, and 7555.

Upper Permit Limit: 0.000062 pounds per million Btus  
Reference Test Method: see table 5.2 of subpart DDDDD  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-74: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 225-1.2 (h)**

**Item 1-74.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015  
Process: K15

Regulated Contaminant(s):  
CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 1-74.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The sulfur content of distillate fuel oil fired in Boiler 44 (ES 321 AJ) is limited to 0.0015 percent by weight.

library condition??

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: OIL (NOT ELSEWHERE CLASSIFIED)  
Parameter Monitored: SULFUR CONTENT  
Upper Permit Limit: 0.0015 percent by weight  
Monitoring Frequency: PER DELIVERY  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-75: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 52.21, Subpart A**

**Item 1-75.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015  
Process: K15

Regulated Contaminant(s):  
CAS No: 0NY075-00-0 PARTICULATES

**Item 1-75.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In order to maintain compliance with 40 CFR 52.21 Prevention of Significant Deterioration (PSD), 40 CFR 60.42(a)(1) NSPS Subpart D, and 6 NYCRR 227-1.2(a)(3), particulate emissions from the combustion of bituminous coal in Boiler 44 (ES 321AJ) shall not exceed 0.035 lb/mmBtu ( as established in the initial PSD permit for this boiler). To demonstrate compliance with this particulate limit, a stack test shall be conducted once during the term of this permit. A stack test protocol shall be submitted to the Department according to the procedures of 6 NYCRR Part 202.

Upper Permit Limit: 0.035 pounds per million Btus  
Reference Test Method: Method 5  
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT  
Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-76: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 60.332(a), NSPS Subpart GG**

**Item 1-76.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

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Process: K21

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-76.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No owner/operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain NOx in excess of 156.4 ppmv NOx @ 15% O2.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 156.4 parts per million by volume  
(dry, corrected to 15% O2)

Reference Test Method: METHOD 7E

Monitoring Frequency: UPON PERMIT RENEWAL

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-77: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 60.46b(f), NSPS Subpart Db**

**Item 1-77.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K22

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 1-77.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To determine compliance with the emission limit for nitrogen oxides required by §60.44b(a)(4) for duct burners used in combined cycle systems, the owner or operator of an affected facility may elect to use the CEMS for measuring NOx and O2 and meet the requirements of §60.48b. The NOx emission rate measured at the outlet from the steam generating unit shall constitute the NOx emission



rate from the duct burner of the combined cycle system.

In accordance with subdivision 60.49b(b) of this subpart, RED shall submit to the Administrator the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in appendix B.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-78: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 227-1.3 (a)**

**Item 1-78.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-00015

Process: K23

**Item 1-78.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Except as permitted by a specific part of Title 6 of the NYCRR, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 27 percent opacity. Operators shall be required to perform the following during operation of the Medium Pressure Dual Fuel Boiler (Source 321BK) while operating on No. 2 Fuel:

1) Observe the stack when the boiler is operating on No. 2 Fuel once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day



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- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Inclement weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days firing oil (the firing of other fuels in between days of firing oil does not count as an interruption in the consecutive days of firing oil), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence.

The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**\*\* NOTE \*\*** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 1-79: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 40CFR 63.7500(a)(1), Subpart DDDDD**

**Item 1-79.1:**

The Compliance Certification activity will be performed for:

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Emission Unit: U-00015  
Process: K23

Regulated Contaminant(s):  
CAS No: 0NY507-00-0  
40 CFR 63 SUBPART DDDDD TOTAL SELECTED METALS

**Item 1-79.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of a new industrial, commercial, or institutional light liquid fuel-fired boiler with heat input capacity of 10 million Btu per hour or greater located at a major source of HAP emissions must limit the concentration of total selected metal (TSM) emissions. TSM consists of the sum of the following metallic hazardous air pollutants: arsenic, beryllium, cadmium, chromium, lead, manganese, nickel, and selenium.

The concentration limit for TSM is 0.000029 lb/mmBtu of heat input or less based on the average of three runs. Each run must collect a minimum of three dry standard cubic meters.

The performance stack test must be conducted at the representative operating load conditions while burning the type of fuel or mixture of fuels that have the highest emissions potential for each regulated pollutant. The owner or operator of an industrial, commercial, or institutional boiler that demonstrates compliance with a performance stack test must maintain the operating load of each unit such that it does not exceed 110 percent of the highest hourly average operating load recorded during the most recent performance stack test.

The facility must also meet the applicable operating limits listed in table 4 of subpart DDDDD.

Initial compliance will be demonstrated according to the provisions in 40 CFR 63.7530.

Subsequent performance tests will be required as specified in 40 CFR 63.7515, which requires performance tests to be conducted on an annual basis, no more than 13 months after the previous performance test. Testing can be reduced if the requirements in 40 CFR 63.7515 are followed.

Continuous compliance will then be demonstrated according to 40 CFR 63.7540. The facility must submit notifications



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and reports and keep records and according to the provisions in 40 CFR 63.7545, 7550, and 7555.

Upper Permit Limit: 0.000029 pounds per million Btus  
Reference Test Method: see table 5.2 of subpart DDDDD  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION  
Averaging Method: AVERAGING METHOD - SEE MONITORING  
DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 234: Good air pollution control practices**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**  
**Applicable Federal Requirement:40CFR 63.7500(a)(3), Subpart DDDDD**  
**Replaced by Condition(s) 1-12**

**Item 234.1:**  
This Condition applies to:

Emission Unit: U00015  
Process: K23

Emission Unit: U00015  
Process: K24

**Item 234.1:**  
This Condition applies to Emission Unit: U-00015  
Process: K23

**Item 234.2.3:**  
At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**Condition 237: Demonstrating Compliance**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**  
**Applicable Federal Requirement:40CFR 63.7505(c), Subpart DDDDD**  
**Replaced by Condition(s) 1-13**

**Item 237.1:**

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This Condition applies to:

Emission Unit: U00015  
Process: K23

Emission Unit: U00015  
Process: K24

**Item 237.1:**

This Condition applies to Emission Unit: U-00015  
Process: K23

**Item 237.2.3:**

The owner or operator of an industrial, commercial, or institutional boiler located at a major source of HAP must demonstrate compliance with all applicable emission limits using performance stack testing, fuel analysis, or continuous monitoring systems (CMS), including a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS), continuous parameter monitoring system (CPMS), or particulate matter continuous parameter monitoring system (PM CPMS), where applicable. The owner or operator may demonstrate compliance with the applicable emission limit for hydrogen chloride (HCl), mercury, or total selected metals (TSM) using fuel analysis if the emission rate calculated according to 40 CFR 63.7530(c) is less than the applicable emission limit. (For gaseous fuels, the owner or operator may not use fuel analyses to comply with the TSM alternative standard or the HCl standard.) Otherwise, the owner or operator must demonstrate compliance for HCl, mercury, or TSM using performance testing, if subject to an applicable emission limit listed in Tables 1, 2, or 11 through 13 to subpart DDDDD.

**Condition 251: Notification of compliance status**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 63.7545(e), Subpart DDDDD**

**Replaced by Condition(s) 1-20**

**Item 251.1:**

This Condition applies to Emission Unit: U-00015  
Process: K23

**Item 251.2:**

Owners and operators that are required to conduct an initial compliance demonstration as specified in 40 CFR 63.7530 must submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii). For the initial compliance demonstration for each affected source, the owner or operator must submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion

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of all performance test and/or other initial compliance demonstrations for the affected source according to 40 CFR 63.10(d)(2). The Notification of Compliance Status report must contain all the information specified in 40 CFR 63.7545(e)(1) through (8), as applicable.

**Condition 264: General provisions**  
**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 63.7565, Subpart DDDDD**

**Replaced by Condition(s) 1-21**

**Item 264.1:**

This Condition applies to:

Emission Unit: U00015  
Process: K23

Emission Unit: U00015  
Process: K24

**Item 264.1:**

This Condition applies to Emission Unit: U-00015  
Process: K23

**Item 264.2.3:**

Table 10 to subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1 through 63.15 apply to the facility. The owner or operator is responsible for ensuring they comply with all General Provisions contained in Table 10.



**STATE ONLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**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 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.

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.**

**Condition 274: Contaminant List**

**Effective between the dates of 09/11/2015 and Permit Expiration Date**

**Applicable State Requirement:ECL 19-0301**

**Item 274.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000071-43-2  
Name: BENZENE

CAS No: 000075-09-2  
Name: DICHLOROMETHANE

CAS No: 000124-38-9  
Name: CARBON DIOXIDE

CAS No: 000630-08-0  
Name: CARBON MONOXIDE

CAS No: 007439-92-1  
Name: LEAD

CAS No: 007439-97-6  
Name: MERCURY

CAS No: 007446-09-5  
Name: SULFUR DIOXIDE

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CAS No: 007647-01-0  
Name: HYDROGEN CHLORIDE

CAS No: 0NY075-00-0  
Name: PARTICULATES

CAS No: 0NY075-00-5  
Name: PM-10

CAS No: 0NY075-02-5  
Name: PM 2.5

CAS No: 0NY100-00-0  
Name: TOTAL HAP

CAS No: 0NY210-00-0  
Name: OXIDES OF NITROGEN

CAS No: 0NY507-00-0  
Name: 40 CFR 63 SUBPART DDDDD TOTAL SELECTED METALS

CAS No: 0NY998-00-0  
Name: VOC

**\*\*\*\* Emission Unit Level \*\*\*\***

**Condition 1-80: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement: 6 NYCRR 242-1.4 (b)**

**Item 1-80.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):  
CAS No: 000124-38-9 CARBON DIOXIDE

**Item 1-80.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Notwithstanding Subdivision (a) of this Section, any unit that, on or before December 1, 2008, applies for a enforceable permit condition restricting the supply of the unit's annual electrical output to the electric grid to less than or equal to 10 percent of the annual gross





generation of the unit, and that from and after January 1, 2009 complies with the 10 percent restriction and the provisions in Paragraph (b)(3) of this Section, shall be exempt from the requirements of this Part, except for the provisions of this Section, Sections 242-1.2, 242-1.3, and 242-1.6 of this Part.

The exemption under Paragraph (b)(1) of this Section shall become effective as of January 1, 2009 and remain in effect unless and until the unit loses its exemption under Subparagraph (b)(3)(v) of this Section.

A unit exempt under Paragraph (b)(1) of this Section shall comply with the restriction on percentage of annual gross generation that may be supplied to the electric grid described in Paragraph (b)(1) of this Section.

A unit exempt under Paragraph (b)(1) of this Section shall report to the department the amount of annual gross generation and the amount of annual gross generation supplied to the electric grid during the year by the following February 1st.

For a period of 10 years from the date the records are created, the owners and operators of a unit exempt under Paragraph (b)(1) of this Section shall retain, at the source that includes the unit, records demonstrating that the conditions of the permit under Paragraph (b)(1) of this Section were met. The 10-year period for keeping records may be extended for cause, at any time prior to the end of the period, in writing by the department. The owners and operators bear the burden of proof that the unit met the restriction on the percentage of annual gross generation that may be supplied to the electric grid.

The owners and operators and, to the extent applicable, the CO<sub>2</sub> authorized account representative of a unit exempt under Paragraph (b)(1) of this Section shall comply with all the requirements of this Part concerning all time periods for which the exemption is not in effect, even if such requirements arise, or must be complied with, after the exemption takes effect.

On the earlier of the following dates, a unit exempt under Paragraph (b)(1) of this Section shall lose its exemption:

(a) the date on which the restriction on the percentage of annual gross generation that may be supplied to the electric grid described in Paragraph (b)(1) of this Section is removed from the unit's permit or otherwise becomes no longer applicable in any year that commences on

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or after January 1, 2009; or

(b) the first date on which the unit fails to comply, or on which the owners and operators fail to meet their burden of proving that the unit is complying, with the restriction on the percentage of annual gross generation that may be supplied to the electric grid described in Paragraph (b)(1) of this Section during any year that commences on or after January 1, 2009.

A unit that loses its exemption in accordance with Subparagraph (b)(3)(v) of this Section shall be subject to the requirements of this Part. For the purpose of applying permitting requirements under Subpart 242-3 of this Part, allocating allowances under Subpart 242-5 of this Part, and applying monitoring requirements under Subpart 242-8 of this Part, the unit shall be treated as commencing operation on the date the unit loses its exemption.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 12 calendar month(s).

**Condition 1-81: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement:6 NYCRR Part 249**

**Item 1-81.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00015

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

**Item 1-81.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Pursuant to 6 NYCRR Part 249.3(e), before commencing any required construction or process changes, the owner or operator must submit an application for a permit or permit modification as required under Part 201 of this Title.

Consistent with the Department's approval of SDEGS/Eastman Business Park BART Determination, Boiler 42 will be

**New York State Department of Environmental Conservation**

Permit ID: 8-2699-00126/00001

Facility DEC ID: 8269900126



permanently shut down or repowered by the compliance date specified in the National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR 63 Subpart DDDDD, but no later than August 16, 2017.

If the decision is made to retire Boiler 42, RED will notify the Department in writing upon retirement of the unit and submit an application for a permit modification to reflect the permanent shut down of the unit.

If the decision is made to repower Boiler 42 with natural gas, RED will submit an application for a permit modification for the project and shall comply with BART by controlling NOx emissions to meet an emission limit not to exceed 0.20 lb/mmBTU, consistent with the fuel switching provisions of 227-2.5(a).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

Subsequent reports are due every 6 calendar month(s).