Petition of Fortistar North Tonawanda LLC and Digihost International Inc. for a Declaratory Ruling Regarding Application of Section 70 and 83 of the New York State Public Service Law and the Alternative, Approval of the Proposed Transaction Pursuant to Sections 70 and 83.

Case 21-M-0238

#### <u>Third Response of Fortistar North Tonawanda, LLC and Digihost International Inc.</u> (Petitioners) to New York State Department of Public Service ("DPS") Directive for <u>Clarification and Documents ("DPS-001")</u>

Petitioners hereby submit the following third response to DPS-001, including its initial responses to items DPS-001-1 to 4; DPS-001-8; DPS-001-11 to 19; DPS-001-23 to 29. Petitioners reserve the right to supplement these responses and by providing these responses Petitioners do not waive any legal or factual arguments related to this administrative proceeding or any other proceeding or forum.

**<u>DPS-001-1</u>**: State whether the Companies contend that the proposed use of the Facility is anticipated to interfere with or be inconsistent with the attainment of the statement greenhouse gas emissions limits established in article 75 of the environmental conservation law (see CLCPA  $\S7(2)$ ).

a. If no, explain why not.

#### Response:

The Companies use of the Facility will not interfere with or be inconsistent with the attainment of the state greenhouse gas ("GHG") emissions limits established in the CLCPA. The Companies currently operate the Facility in compliance with a valid Title V Air Permit ("Air Permit") under review for renewal. Critically, the Companies do not propose any significant modifications of the Air Permit in the renewal application. According to New York State Department of Environmental Conservation's ("NYSDEC") policy document ("DAR-21") guiding NYSDEC's review of Air Permit renewals pursuant to § 7(2) of the CLCPA, "[a] permit renewal that does not include a significant modification, as described in Part 201, and would not lead to an increase in actual or potential GHG emissions would in most circumstances be considered consistent with the CLCPA." *See* DAR-21 at 3. Accordingly, as the Companies propose no significant modification that would result in an increase in actual or potential GHG above that which is permitted under the current Air Permit, the proposed use is consistent with the CLCPA.

Furthermore, as the Commission explained in its *Order Denying Petition* (regarding the *Petition for Rehearing* by Earthjustice, *et al.*):

It is the Title V permit, not any Commission-issued "permit," that governs the Facility's air emissions. The NYSDEC's consideration of whether to approve or renew the air emission permit for the Facility, moreover, is the type of administrative approval subject to CLCPA §7. Given that the existing Facility permit was issued in accordance with environmental statutes and regulations that ensure the Facility is operated in a manner that is protective of the environment, the Commission finds that the Declaratory Ruling is not inconsistent with, and will not interfere with the attainment of, the statewide GHG gas emissions limits established by the NYSDEC. Likewise, the operation of the existing Facility in accordance with applicable, existing, and valid permits will not disproportionately burden disadvantaged communities.

Case 21-M-0238, Order Denying Petition, at 11 (issued June 23, 2023).

*See also*, Exhibit D, Conformity Review (previously filed as First Response, Part IV of VI, Exhibit C, at PDF page 8, re-attached hereto for convenience) ("Conformity Review") and Conformity Supplements, (filed previously at First Response, Parts IV and V of VI, at Exhibit C), (collectively, "Conformity Review and Supplements").

**<u>DPS-001-2</u>**: Identify which greenhouse gases and co-pollutant emissions are currently created and released from the Facility by the operation of the Facility.

Response:

Refer to the 2021 Title V Renewal Application previously submitted First Response, item 22. *See also* Conformity Review and Supplements, cited *supra*.

**<u>DPS-001-3</u>**: 3. *Provide the type and amount of greenhouse gas and co-pollutant emissions attributable to the Facility each year beginning January 1, 2020 until the present time* 

Response:

See Annual ACE reports to NYSDEC. Attached hereto as Exhibit E.

**<u>DPS-001-4</u>**: Provide the Facility's projected actual greenhouse gas and co-pollutant emissions for 2030, 2040, and 2050.

Response:

	Annual GHG Emissions (tpy) Per Emissions Unit <sup>(a)(b)(c)</sup>																
V	U-00001					U-0	0002		U-00003			U-00004			Total		
rear	CO <sub>2</sub>	CH4	N <sub>2</sub> O	CO <sub>2</sub> e	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e	CO <sub>2</sub> e
2030	347,032. 94	1,961.48	1.72	518,077. 15	380.69	0.53	3.72E-03	456.40	75.13	0.10	7.34E-04	90.08	0	0	0	0	518,623. 63
2040	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2050	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**DPS-001-8**: Provide an explanation of any factors or circumstances that provide justification for the continued operation of the Facility. The explanation should consider, at a minimum, economic, electric consumer pricing, electric power grid reliability, social, and/or environmental justification(s).

Response:

Continued operation of the Facility will depend on many factors including but not limited to fuel prices, other power plant resources and CLCPA regulations. As noted in response 10, previously submitted, the Facility frequently, and increasingly, provides electricity to the New York State electric grid and thus discontinuing or curtailing operations could negatively impact electric consumer pricing. The Facility also helps to ensure electric power grid reliability by providing electricity to the New York State electric grid on high demand days. *See also* response 9 (Gold Book), previously submitted.

As discussed in the New York Independent System Operator ("NYISO") Comprehensive Reliability Plan ("CRP"), "reliability margins have thinned to concerning levels" due to the outpacing retirement of dispatchable fossil fuel resources. CRP, at 72. While the transition to renewable energy resources is a primary goal of the CLCPA, due to the inherent limitations of same and the variable meteorological vulnerability of their generation, transition "may result in an increased need for sufficient dispatchable and non-energy limited resources to address all conditions and to provide continued reliability." *Id.*, at 75. The Facility is a presently available and operating resource available for dispatch at all times and cannot currently be replaced by equivalent zero-emission resources which are "not commercially available at this time," *Id.*, at 79. *See also* NYISO 2024 Reliability Needs Assessment ("RNA"), at 9-10 (detailing declining statewide reliability margins due to insufficient generation resulting from retirement of fossil fuel resources without concomitant new generation developed.).

The New York State Climate Action Council discussed the necessity for protecting grid reliability during implementation of the CLCPA in its Final Scoping Plan:

While transitioning away from fossil fuel use, maintaining reliable access to power, whether through centralized or distributed energy sources, is crucial for maintaining good public health in our energy-dependent society. Increasing the reliability of electric systems and delivery can reduce health effects during high temperatures, when air conditioning is the principal means to prevent heat-related morbidity and mortality. A study of citywide and localized power outages in New York City during warm weather found associations with respiratory disease, renal disease, and all-cause mortality, though these associations were not necessarily consistent across outages. During summer, power outages pose specific health-related impacts such as spoiled food and digestive tract illness, spoiled vaccines, and increased rodent populations as a result of discarded perishables. Winter outages also pose specific risks to public health. One study found that the health risks are greater following winter storms with power outages, compared with winter storms alone. Localized cold weather power outages in New York City were associated with all-cause mortality and cardiovascular disease hospitalizations but fewer respiratory disease hospitalizations. Increases in carbon monoxide poisoning during storm-related power outages have been reported in several studies. Following a 2006 winter storm in Western New York that resulted in extensive power outages, 264 people visited emergency departments to be evaluated for carbon monoxide poisoning.

Final Scoping Plan at 105-106. These concerns are all-the-more pressing with the unavoidable shift to a winter peak. *See generally* RNA.

The Facility, as a key link in the New York electric grid, particularly in Western New York, provides mission critical reliability backstop support necessary to "prevent millions of dollars in damages and prevent premature mortality." *Id.* at 106.

**<u>DPS-001-11</u>**: State whether the Facility is expected to continue to provide electricity to the New York State electric grid from present to 2050.

Response:

We anticipate that the facility will provide electricity to the NYS electric grid until 2050 or earlier if fossil fuel facilities are required to cease operation.

**<u>DPS-001-12</u>**: Indicate whether there are any present plans to disconnect the Facility from the New York State electric grid.

Response:

There are no plans to disconnect the Facility from the New York State electric grid.

**DPS-001-13**: Describe any alternatives currently implemented or planned by the Facility owner and operator to the combustion of fossil fuels to power the Facility. Include, at a minimum: the timeline for such alternative(s), what permission(s) would be needed from the Public Service Commission and/or other New York State agencies or federal regulatory bodies (e.g., NRC, FERC, Service).

*EPA*, *USACOE*), whether and how such alternative(s) would comply with the directives of the CLCPA, and any other relevant information.

#### Response:

No alternatives are currently in advanced stages of planning or implementation. The Companies are currently researching best available technology to conform with the CLCPA requirements. Items currently under research are carbon capture and hydrogen combustion. The Companies are also investigating possible options with a Small Modular Reactor as a potential zero emissions source. Digihost and Nano Nuclear signed a non-binding Memorandum of Understanding to potentially deploy a 60 MW microreactor.<sup>1</sup> None of the foregoing mitigation/alternative items are sufficiently reviewed to assess regulatory approvals.

**<u>DPS-001-14</u>**: Describe any currently implemented greenhouse gas emissions mitigation measures for the Facility. Include a detailed description of how and to what extent the emissions are mitigated and when such mitigation measures were implemented at the Facility.

#### Response:

None to date other than what has been previously implemented per the Title V permit, which is steam injection for NOx control.

**<u>DPS-001-15</u>**: Describe what actions identified in the August 26, 2021 Supplemental Filing have been implemented at the Facility.

#### Response:

When operating from utility power, the facility purchases a blend of renewable resources such as hydro and solar power.

**<u>DPS-001-16</u>**: Describe any actions identified in the August 26, 2021 Supplemental Filing that have not been implemented at the Facility.

#### Response:

The facility has not implemented the RNG process. This is because at this time RNG is not accepted as a renewable resource in New York. RNG emissions are similar to natural gas and, therefore, no longer considered an alternative. The progress and use of hydrogen

<sup>&</sup>lt;sup>1</sup> The City of North Tonawanda has adopted a moratorium banning such facilities.

operations has not progressed as quickly as anticipated, and therefore, is not presently a practicable alternative. The Companies continue to review alternatives with the intention of meeting the CLCPA goals and emissions limits.

**<u>DPS-001-17</u>**: Describe any planned future greenhouse gas emissions mitigation measures for the Facility. Include, at a minimum, a timeline for the implementation of these planned mitigation measures, a detailed description of how and to what extent the emissions would be mitigated.

#### Response:

At this time there are no planned mitigation measures developed to the point of potential implementation. Please see answers to items 13 through 16.

**<u>DPS-001-18</u>**: For each implemented mitigation measure, state whether it is expected to result in the reduction of greenhouse gas emissions in the same amount, more, or less than the increases in greenhouse gas emissions resulting from the Facility.

#### Response:

N/A at this time as to facility emissions. The mitigation measures for grid-supplied energy to the facility reduce greenhouse gas emissions applicable to such energy use.

**<u>DPS-001-19</u>**: For each proposed mitigation measure, state whether it may result in the reduction of greenhouse gas emissions in the same amount, more, or less than the increases in greenhouse gas emissions resulting from the Facility.

#### Response:

If and when implemented, hydrogen or SMR would result in a reduction of greenhouse gas emissions.

**<u>DPS-001-23</u>**: State whether the Facility is located inside an identified disadvantaged community as identified using the mapper maintained on the NYSERDA website.

#### Response:

No. The facility is located northeast of the nearest DAC adjacent to Erie Avenue in North Tonawanda.

**<u>DPS-001-24</u>**: State the distance in miles between the Facility and the closest border of the closest disadvantaged community.

Response:

The nearest disadvantaged community is .86 miles to the southwest of the Facility, however, the nearest disadvantaged community located downwind of the Facility is approximately 18 miles away.

**<u>DPS-001-25</u>**: State whether the Companies contend that the proposed use of the Facility is anticipated to disproportionality burden a disadvantaged community (see CLCPA §7(3)). *a.* If no, explain why not.

Response:

No.

See Responses to Items 24 and 27.

Furthermore, the Facility is not a major stationary source of HAP (i.e., PTE will not exceed 10 tpy for an individual HAP or 25 tpy for total HAP) and is not a major stationary source of PM (100 tpy), VOC (50 tpy), or SO2 (100 tpy). Refer to the emissions inventory provided in the Title V renewal application for more information.

The Facility is a major stationary source of NOx (100 tpy) and CO (100 tpy). However, the Facility monitors both NOx and CO emissions with continuous emissions monitoring systems (CEMS) to ensure compliance with applicable emissions limits established in the Title V operating permit.

**DPS-001-26**: State whether the greenhouse gas or co-pollutant emissions currently authorized by the existing Title V air emission permit violate New York State air quality standards. Explain how this conclusion was determined and provide any studies done, including any modeling of air impacts generated by the Facility.

Response:

There are no NAAQS or statewide air quality standards for greenhouse gas emissions. Therefore the Facility's greenhouse gas emissions are not in violation of an applicable standard.

However, the Facility has conducted air dispersion modeling as required by the NYSDEC. Modeled ambient air impacts for both NO2 and CO show that the emissions from the Facility will not cause or contribute to an exceedance of the NAAQS for a regulated air pollutant.

**DPS-001-27**: Identify all potential disproportionate burdens on disadvantaged communities resulting from the air emissions authorized by the current Title V permit. a. Identify which disadvantaged communities would be disproportionately burdened.

#### Response:

The Facility is not located in an area identified by the NYSDEC as a DAC. In accordance with NYSDEC guidance provided in policy document DEP 24-1, the impact area of an evaluation should be the area within one-half mile of the Facility. The nearest DAC is located 0.86 miles from the Facility. The nearest downwind DAC is 18 miles away. Therefore, a disproportionate burden analysis is not required.

*b. Explain how these burdens were identified.* 

Response:

Not applicable, see above.

**<u>DPS-001-28</u>**: Identify any systems, structures, components, or mitigation design measures that are intended to ensure that the Facility does not disproportionately burden surrounding disadvantaged communities. Explain how the referenced measures will ensure this result.

#### Response:

*See* responses to Items 24, 25 and 27. The facility is not in a DAC, the nearest is 0.86 miles away, beyond the NYSDEC guidance half-mile threshold and the nearest downwind DAC is 18 miles away.

Nonetheless, refer to the Facility's Title V operating permit for the methods and work practices for systems, structures, components, or mitigation design measures that are intended to ensure that the Facility does not disproportionately burden surrounding disadvantaged communities.

The Facility is in compliance with the existing limitations and requirements on operations, emissions, and work practices established in the Title V operating permit. These limitations are established to be protective of ambient air quality in the areas surrounding the Facility. These limitations and requirements include, but are not limited to, the following:

- Emissions monitoring, testing, recordkeeping, and reporting requirements
- Use of natural gas as the primary fuel for power generation along with limitations on the use of distillate fuel oil.

- Limits to the number of hours of operation for certain emissions units
- Use of CEMS for monitoring emissions of NOx and CO in real-time.

<u>DPS-001-29</u>: Identify the potential consequences that could occur to various residential communities throughout Niagara or Erie Counties if insufficient electric power were available to the grid during an extreme heat or polar vortex or snow emergency.

#### Response:

If insufficient electric power were available to Niagara or Erie Counties during an extreme heat day, residents may be unable to use electricity for essential needs such as refrigeration and air conditioning. Extended blackouts during heat events increase the risk of heatrelated mortality and the need for medical attentions, especially among older populations and those with existing health issues. See, e.g., Brian Stone Jr., et al., How Blackouts during Heat Waves Amplify Mortality and Morbidity Risk, Environ Science Technology Vol. 57, Issue 2022, 8245 (May 23, 2023), available at

<u>https://pubs.acs.org/doi/epdf/10.1021/acs.est.2c09588?ref=article\_openPDF</u>. Similarly, blackouts occurring during severe winter weather would pose serious risks to residents by making electric heat, lighting, and appliances inoperable.

See also Response to Item 8, above.

Petition of Fortistar North Tonawanda LLC and Digihost International Inc. for a Declaratory Ruling Regarding Application of Section 70 and 83 of the New York State Public Service Law and the Alternative, Approval of the Proposed Transaction Pursuant to Sections 70 and 83.

Case 21-M-0238

#### Verification

The undersigned, an attorney admitted to practice in the Courts of New York State, deposes and says that deponent is a member of Phillips Lytle LLP; that deponent has read the foregoing Third Response to DPS-001, and previously filed First and Second Response to DPS-001, and knows the contents thereof; that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters deponent believes it to be true.

Dated April 11, 2025

Thomas F. Puchner

Thomas F. Puchner, Esq. Attorney for Petitioners Petition of Fortistar North Tonawanda LLC and Digihost International Inc. for a Declaratory Ruling Regarding Application of Section 70 and 83 of the New York State Public Service Law and the Alternative, Approval of the Proposed Transaction Pursuant to Sections 70 and 83.

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#### Verification

Daniel Rotunno, being duly sworn, deposes and says that I am the Vice President of Operations and authorized representative of Fortistar North Tonawanda LLC and Digihost International Inc. in the above-entitled proceeding, that I have read the First, Second and Third Responses to DPS-001 and know the contents thereof and that the same is true and accurate to the best of my knowledge as to Petitioners.

Dated April 11, 2025

<u>Daníel Rotunno</u>

Daniel Rotunno Vice President of Operations



# CLIMATE LEADERSHIP AND COMMUNITY PROTECTION ACT (CLCPA)

## **CONFORMITY REVIEW**

SEPTEMBER 2022



North American Energy Services Fortistar North Tonawanda LLC 1070 Erie Avenue North Tonawanda, NY 14120



New York State Department of Environmental Conservation Division of Environmental Permits, Region 9 700 Delaware Avenue Buffalo, NY 14203



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#### 1. INTRODUCTION AND BACKGROUND INFORMATION

#### 1.1 FACILITY DESCRIPTION & PERMITTING HISTORY

The NAES Corporation (NAES) operates the Fortistar North Tonawanda LLC<sup>1</sup> (FNT) cogeneration plant (Facility) located in North Tonawanda, New York. The Facility is classified as a major source as defined by the federal operating permit program (40 CFR Part 70). In addition, the Facility is also subject to subject to 6 New York Codes, Rules and Regulations (NYCRR) Section 201-6 (Title V Facility Permits) under Subchapter A (Prevention and Control of Air Contamination and Air Pollution). The Facility currently operates under Title V Permit No. 9-2912-00059/00013 (Permit). FNT submitted an application to renew the Permit (Application) to NYSDEC on April 21, 2021.

#### 1.2 NYSDEC REQUEST FOR CLCPA CONFORMITY REVIEW

In July 2019, New York State passed the Climate Leadership and Community Protection Act (CLCPA) with the intention of reducing greenhouse gas (GHG) emissions and associated climate impacts. The CLCPA requires the New York State Department of Environmental Conservation (NYSDEC) and other agencies to evaluate statewide GHG emissions and subsequently promulgate regulations that will reduce emissions of GHG.

NYSDEC has provided guidance which states that all new Air State Facility (ASF) permit applications, Title V permit applications, and significant modifications to existing permits must include an evaluation of climate impacts. Further, the NYSDEC guidance<sup>2</sup> dated February 2021 requires evaluation of upstream and downstream emissions from natural gas transmission for natural gas-fired units. Additional guidance from NYSDEC states that facilities located in Potential

<sup>&</sup>lt;sup>1</sup> Effective April 25, 2018 Fortistar North Tonawanda Inc. converted from a corporation to a limited liability company and changed its name to Fortistar North Tonawanda LLC.

<sup>&</sup>lt;sup>2</sup> DAR-21. The Climate Leadership and Community Protection Act and Air Permit Applications. New York State Department of Environmental Conservation. February 2021.



Environmental Justice Areas (PEJA) shall include an evaluation of the impact of co-pollutants on disadvantaged communities in addition to an evaluation of climate impacts.

On July 13, 2022, NYSDEC issued a Notice of Incomplete Application (NOIA) to FNT in response to its administrative review of the Application. Pursuant to Section 7(2) of the CLCPA, Item 3 of the NOIA requested a conformity review to provide a historical and projected future inventory of the Facility's GHG emissions and a discussion of the method(s) the Facility will use to comply with the CLCPA's requirement for zero emissions from the electricity generation sector by 2040. A copy of the NOIA is provided in Attachment A. The remainder of this document represents FNT's conformity review demonstrating that the Facility's proposed operation is consistent with the CLCPA.



#### 2. EMISSION UNIT DESCRIPTION

The Facility generates steam and electric power using a stationary combustion turbine (CT), heat recovery steam generator (HRSG) equipped with two duct burners, and a steam turbine generator (U-00001). A small auxiliary boiler (ES0002) assists with startup and other Facility needs. The Facility also operates a primary diesel emergency generator engine (U-00002) and a secondary diesel starting motor (U-00003) used to rotate the CT to a speed at which it can be fired. A larger standby natural gas-fired auxiliary boiler (U-00004) is used to supply heating and other process steam loads when the CT is off-line. Table 2-1 summarizes the units at the Facility that are subject to the CLCPA.

Emission Unit	Emission Source ID	Description	Rated Capacity
	ES00001	55 MW natural gas and oil-fired combustion turbine with HRSG	55-MW
U-00001	ES00001	Two duct burners	18.8 MMBtu/hr each
	ES00002	Cleaver Brooks 200-20-150 natural gas and distillate oil-fired boiler	10.5 MMBtu/hr
U-00002	ES00003	Caterpillar 3512 DITA emergency generator	10.5 MMBtu/hr
U-00003	ES00004	Detroit Diesel 660 HP starting motor	4.3 MMBtu/hr
U-00004 ES00006		Cleaver Brooks Steam Unit natural gas-fired boiler	49.5 MMBtu/hr

Table 2-1 GHG-Emitting Sources Subject to the CLCPA



#### 3. GREENHOUSE GAS EMISSIONS INVENTORY

The Facility's actual GHG emissions were calculated based on historical operational data. Anticipated actual and potential GHG emissions for the proposed renewal term of the Permit were calculated assuming the Facility operates within the permitted limits for both permitted fuels (natural gas and distillate oil), with specific limits placed on the amount of distillate oil or number of hours of operation using distillate oil that are allowed in a year. The detailed calculations and Facility data used to develop the GHG emissions inventory are provided in Attachment B.

The Facility's projected future GHG emissions were calculated for the years 2030, 2040, and 2050. Pursuant to Environmental Conservation Law (ECL) Article 75, the CLCPA's Statewide GHG emissions limits require a Statewide reduction in GHG emissions from 1990 levels of 40% by 2030 and 85% by 2050. Further, the CLCPA requires that the energy generation sector achieve zero-GHG emissions by 2040. Multiple operating scenarios were considered to evaluate how the GHG emissions from the Facility can be mitigated or reduced consistent with these requirements while maintaining operations at the Facility.

All GHG emissions calculations provided in this report use the 20-year global warming potentials (GWPs) found in 6 NYCRR Section 496.5 and the associated emissions factors provided in Appendix A of the 2021 New York State Statewide GHG Emissions Report<sup>3</sup>. Additionally, based on NYSDEC guidance dated February 2021, upstream and downstream GHG emissions from natural gas transmission have been included in the analysis. For a description of additional applicable requirements related to the Facility's GHG emissions, refer to the Part 251, CO<sub>2</sub> Performance Standards Application provided in Appendix G of the April 2021 Application.

<sup>3</sup> NYSDEC (2021) Summary Report. 2021 NYS Statewide GHG Emissions Report. https://www.dec.ny.gov/energy/99223.html



#### 3.1.1 Greenhouse Gas Emissions: Historical

Item 3a. of the NOIA requires that FNT submit an inventory of actual GHG emissions from the Facility, in tons per year per GHG species and in terms of carbon dioxide equivalents (CO<sub>2</sub>e), for each year since 2015. FNT has provided additional data for the years of 2012-2014 to account for the lower annual operating capacities experienced during the COVID-19 pandemic from 2020-2021. GHG emissions reported during the years 2020-2021 are not assumed to be representative of the future operating capacity of the Facility. It is possible that the historical operating capacity and utilization may not be representative of future Facility operation. For example, the discontinuance of the Somerset coal plant in Barker, New York and the construction of the Next Era 345KV transmission line, which was placed in service in June of 2022, may change the operation and flow characteristics of the Facility.

Based on the years 2012-2021, Table 3-1 summarizes the actual GHG emissions from the combustion units at the Facility that are subject to the CLCPA. The highest actual GHG emissions from the Facility during this period correspond to the increased operating capacity of the Facility in 2016. A detailed historical GHG emissions inventory in tons per year of each GHG species and in CO<sub>2</sub>e is provided in Attachment B.

Facility Total (tpy)	Actual Annual CO2e Emissions (tpy) Per Emissions Unit					
	U-00004	U-00003	U-00002	U-00001	Year	
58.46	0.00	0.10	2.95	55.42	2021	
49.38	0.00	0.17	27.70	21.51	2020	
17,458.18	0.00	0.39	48.71	17,409.08	2019	
24,359.74	0.00	1.36	62.41	24,295.97	2018	
11,363.60	0.00	0.46	69.31	11,293.83	2017	
84,905.42	0.00	3.42	69.15	84,832.85	2016	
43,277.36	0.00	2.70	88.29	43,186.37	2015	
41,108.16	0.00	6.15	142.64	40,959.37	2014	
53,969.97	0.00	6.31	119.84	53,843.82	2013	
78,200.92	0.00	5.62	136.70	78,058.60	2012	

# Table 3-1Historical GHG Emissions, 2012-2021



#### 3.1.2 Greenhouse Gas Emissions: Proposed Renewal Term of the Permit

Items 3b. and 3c. of the NOIA require FNT to submit an inventory of its anticipated actual GHG emissions from the Facility, in tons per year and CO<sub>2</sub>e, for each year of the proposed renewal term of the Permit from 2022-2026, along with the current generating capacity and utilization rate of the Facility and the planned future capacity and utilization rate of the Facility. On March 17, 2021, FNT's owner, North Tonawanda Holdings LLC, entered into a Membership Interest Purchase Agreement ("MIPA") with Digihost International Inc. (third party) for the purchase and sale of 100% of its interests in FNT. The closing date pursuant to the MIPA is May 1, 2023, and subject to the parties obtaining all necessary regulatory approvals and the satisfaction of other MIPA closing conditions. Upon the transfer of ownership, Digihost International Inc. will own and control FNT, which will continue managing the Facility's daily operations and the legal responsibility of permit compliance. To date, regulatory approvals approvals approving the sale of membership interests from North Tonawanda Holdings LLC to Digihost International Inc. have not yet been obtained. <sup>4</sup>

Neither NAES nor FNT is in a position to speculate on the anticipated operation of the Facility on behalf of the third party. The future operation of the Facility will depend on multiple factors including natural gas and oil fuel pricing, development of renewable generation and supporting transmission, as well as changes to the applicable rules that regulate the Facility. Therefore, the GHG emissions calculations for the proposed renewal term of the Permit conservatively assume that the Facility will operate U-00001, U-00002, and U-00003 within the permitted operating limits for each emissions source and 100% utilization for power generation to the grid. FNT anticipates that the natural gas-fired boiler U-00004 will continue to operate as a stand-by unit and does not anticipate the annual throughput in this unit to increase from the period provided in Table 3-1.

<sup>&</sup>lt;sup>4</sup> A Petition for a Declaratory Ruling Regarding Application of Sections 70 and 83 of the New York State Public Service Law and, in the Alternative, Approval of the Proposed Transaction Pursuant to Sections 70 and 83 is on the September 15, 2022 session agenda of the New York State Public Services Commission for consideration, Case Number 21-M-0238.



The GHG emissions calculations for the proposed renewal term of the Permit consider existing operational restrictions, such as Condition 22, Item 22.2 of the Permit which requires that, except during periods of startup, malfunction and shutdown, the CT may fire distillate oil only while operating at 100% load and may operate at partial loads only while firing natural gas, between 80% and 100% load.

Table 3-2 summarizes the anticipated GHG emissions for the years 2022-2026 for the combustion units at the Facility that are subject to the CLCPA. FNT projects that the average operating capacity of the Facility will be approximately 55% over the renewal term of the Permit. The analysis is based on the Facility location on the National Grid 115kV transmission system and proximity to the city of Buffalo, New York.

Ant	Facility Total					
Year	U-00001	U-00002	U-00003	U-00004	(tpy)	
2026	312,582.52	279.31	55.12	0.00	312,916.95	
2025	312,582.52	279.31	55.12	0.00	312,916.95	
2024	312,582.52	279.31	55.12	0.00	312,916.95	
2023	312,582.52	279.31	55.12	0.00	312,916.95	
2022	312,582.52	279.31	55.12	0.00	312,916.95	

#### Table 3-2

#### Anticipated GHG Emissions, Proposed Renewal Term of the Permit

In addition to calculations describing the Facility's anticipated actual GHG emissions, NYSDEC guidance requires that the Facility provide calculations describing its potential GHG emissions. Table 3-3 summarizes the potential GHG emissions for the years 2022-2026 for the combustion units at the Facility that are subject to the CLCPA. These GHG emissions have been calculated on an 8,760 hour per year basis to represent the maximum operating capacity of the Facility for the proposed renewal term of the Permit and would not lead to an increase in potential GHG emissions. A detailed potential GHG emissions inventory in tons per year each GHG species and in CO<sub>2</sub>e is provided in Attachment B.



Potential Annual CO2e Emissions (tpy) Per Emissions Unit						
Year	U-00001	U-00002	U-00003	U-00004	(tpy)	
2026	568,331.86	507.83	100.23	48,291.46	617,231.37	
2025	568,331.86	507.83	100.23	48,291.46	617,231.37	
2024	568,331.86	507.83	100.23	48,291.46	617,231.37	
2023	568,331.86	507.83	100.23	48,291.46	617,231.37	
2022	568,331.86	507.83	100.23	48,291.46	617,231.37	

#### Table 3-3

#### Potential GHG Emissions, Proposed Renewal Term of the Permit

#### 3.1.3 Greenhouse Gas Emissions: Projected Future Emissions

Item 3d. of the NOIA requires that FNT submit calculations showing the Facility's projected GHG and CO<sub>2</sub>e emissions in the years 2030, 2040, and 2050. The GHG emissions calculations for these projected years assume that the Facility will operate within the permitted operating limits for each emissions source and 100% utilization for electricity generation to the grid. The Facility anticipates that U-00004 will continue to operate as a stand-by unit and does not anticipate the annual throughput to this unit to increase. For the year 2030, the Facility projects that GHG emissions will be equivalent to each year in the proposed renewal term of the Permit. For the years 2040 and 2050, the Facility projects that it will comply with the CLCPA's requirement for zero-GHG emissions from the electricity generation sector. A discussion of the mitigation measures and methods that the Facility evaluated to determine the feasibility of complying with this requirement is provided in Section 4 below.

Table 3-4 summarizes the projected GHG emissions in the years 2030, 2040, and 2050 for the combustion units at the Facility that are subject to the CLCPA. A detailed projected GHG emissions inventory in tons per year per GHG species and in CO<sub>2</sub>e is provided in Attachment B.



#### Table 3-4

#### Projected Facility-Wide GHG Emissions, 2030, 2040, and 2050

Pro	Projected Annual CO2e Emissions (tpy) Per Emissions Unit						
Year	U-00001	U-00002	U-00003	U-00004	(tpy)		
2030	312,582.52	279.31	55.12	0.00	312,916.95		
2040	0.00	0.00	0.00	0.00	0.00		
2050	0.00	0.00	0.00	0.00	0.00		



#### 4. DISCUSSION OF GREENHOUSE GAS MITIGATION SCENARIOS

As previously discussed in Section 3 of this Conformity Review, the CLCPA requires that the energy generation sector achieve zero-GHG emissions by 2040. Multiple scenarios were considered to evaluate how the GHG emissions from the Facility may be mitigated or reduced to comply with this requirement while maintaining operations at the Facility. The mitigation strategies presented below represent currently known or available methods that may provide direct or indirect reductions in the GHG emissions from the Facility. While FNT is not in a position to speculate on the anticipated future operation of the Facility or GHG emissions reduction strategies on behalf of the third party discussed in Section 3.1.2, FNT welcomes an open dialogue with NYSDEC to discuss the feasibility and implementation of reasonably available GHG mitigation strategies to enable the Facility's operations to remain consistent with the requirements of the CLCPA.

#### 4.1 ALTERNATIVE FUELS

The Facility currently burns natural gas in the CT and Duct Burners as the primary fuel for electricity generation to the utility grid. The Facility is permitted for the limited use of distillate oil for electricity generation and to fire the auxiliary boiler (ES00002) and diesel engines (U-00002 and U-00003). For the short- to long-term period leading up to 2040, replacing the existing fuel-burning equipment at the Facility with renewable energy infrastructure of equal capacity is neither technically nor economically feasible for a peaking power plant that experiences intermittent utilization for electricity generation to the grid. However, replacing both natural gas and distillate oil with a less carbon-intense fuel, such as hydrogen-enriched natural gas (HENG), could provide the Facility with an economically feasible alternative source of energy that would mitigate the GHG emissions from burning only fossil fuels and act as a bridge fuel to achieving zero emissions by 2040.

As both the production infrastructure and supply of HENG increase, the Facility may be able to lower the carbon intensity of the natural gas used for electricity generation to the grid. According



Fortistar North Tonawanda LLC CLCPA Conformity Review

to a 2009 paper published by National Grid and Atlantic Hydrogen, Inc.<sup>5</sup>, benefits to utilizing HENG include leveraging existing natural gas pipelines and local delivery systems and the potential to take advantage of the growing recoverable natural gas reserves in North America and natural gas supplies globally. HENG can also be produced without generating carbon dioxide using low-cost off-peak power. In the future, these resources could be utilized to provide a source of alternative fuel to the Facility and support its overall strategy to mitigate GHG emissions that is both increasingly technically and economically feasible. A caveat to the potential for alternatives such as HENG to reduce GHG emissions is that there are numerous technological hurdles that need to be overcome before it can function as a viable alternative fuel for utility power generation. Examples of these hurdles include the effects of hydrogen gas on equipment metallurgy and the lifespan of combustion equipment, as well as concerns over process safety, supply chains, and geographic availability that may hinder fully evaluating the technical and economic feasibility of utilizing HENG in the near term.

#### 4.2 CARBON OFFSETS

GHG emissions from the Facility could also be mitigated in both the short and long term by purchasing carbon offsets on market trading platforms. FNT does not anticipate that this method is currently sufficient to offset or reduce its entire projected GHG emissions in terms of either technical or economic feasibility. However, this method could provide an additional margin of GHG emissions reduction that could be utilized to provide operational flexibility as both energy sector policies and market fluctuations affect the technical and economic feasibility of other GHG mitigation methods.

#### 4.3 DISPATCH MODEL

FNT developed a utility dispatch model (model) to examine the impacts of power sector policies such as the CLCPA on the generation and capacity of the Facility in the near- to long-term for the

<sup>&</sup>lt;sup>5</sup> National Grid and Atlantic Hydrogen Inc. (2009). Hydrogen-Enriched Natural Gas: Bridge to An Ultra-Low Carbon World. Retrieved September 9, 2022, from https://www.osti.gov/etdeweb/servlets/purl/21396875



years 2023-2050. Up to the year 2039, the model projects that the economic feasibility of the current method of power generation at the Facility will fluctuate, with an average capacity factor of 55% and an endpoint in 2040 after which the Facility capacity factor is 0%. FNT is not proposing to limit the projected annual fuel usage or the operating capacity of the Facility according to the capacity factors presented in the model. However, it is important to note FNT developed this model to project the potential impact that the decarbonization of the energy sector will have on the economic feasibility of generating power by burning natural gas. FNT acknowledges that the future economic feasibility scenario presented in this model may require the development of alternate operating strategies that incorporate a mix of the methods presented above to continue power generation at the Facility after 2040.



#### 5. POTENTIAL ENVIRONMENTAL JUSTICE AREAS

NYSDEC has provided guidance that facilities located in PEJA that are home to disadvantaged communities shall include an evaluation of co-pollutants as part of the CLCPA analysis. The Facility is located at 1070 Erie Avenue in North Tonawanda, New York. Based on NYSDEC mapping, this address is not located in an area designated as a PEJA as shown below in Figure 5-1. However, due to the proximity of adjacent areas designated as PEJA to the east and west of the Facility, an analysis of co-pollutants as Hazardous Air Pollutants (HAP) is required to evaluate the potential impacts to these communities. The Facility Emissions Summary of the April 2021 Application, in Appendix C, NYSDEC Forms, reports a Facility-wide total HAP potential to emit (PTE) of 5.48 tons per year. This PTE is based on the Facility using natural gas as the primary fuel for combustion in the CT. The Facility is not a major source for emissions of any individual HAP or for emissions of total HAP. These emissions have been calculated on an 8,760 hour per year basis and would not lead to an increase in potential co-pollutant emissions.

Available data from the United States Environmental Protection Agency's AP-42 Section 3.1: Stationary Gas Turbines indicate that emissions of HAP from combustion turbines are lower than for other combustion sources due to the high combustion temperatures reached during normal operation. Additionally, combustion turbines typically operate close to 100% load for greater fuel efficiency, which reduces HAP emissions. In contrast, in the absence of power generated by the Facility, energy demand could shift to diesel or distillate oil-fired generators at local substations, resulting in increased HAP emissions and potentially greater impacts to disadvantaged communities. Therefore, FNT has concluded that existing measures such as the use of natural gas as the primary fuel for the CT, the existing operating limits required by the Permit, and good operation and maintenance practices are sufficient to mitigate impacts to disadvantaged communities located in areas designated as PEJA.



Figure 5-1 Facility Location





#### 6. CONCLUSION

Based on guidance provided by NYSDEC, a permit renewal that does not include a significant modification and would not lead to an increase in potential GHG emissions would in most circumstances be considered consistent with the CLCPA pending finalization of the scoping plan and future regulations. In addition, the potential emissions of co-pollutants from the Facility are not expected to increase with the proposed permit renewal and therefore would not result in greater economic, social, or environmental harm to disadvantaged communities. Anticipated GHG emissions have been calculated based on the Facility's anticipated operating capacity. No potential GHG emissions increases from the permitted fuel combustion equipment are expected to occur in future years without installing additional equipment, thus triggering a permit modification. Should the Facility propose to either install additional equipment or modifications to the Permit, GHG emissions increases would be evaluated at that time.

Multiple mitigation methods have been evaluated by FNT to reduce or eliminate its GHG emissions to comply with the CLCPA requirement that the energy generation sector achieve zero GHG emissions by 2040. These methods include, but are not limited to, burning alternative fuels such as HENG to generate power, and purchasing carbon offsets to supplement the direct GHG emissions mitigation methods. While FNT is not in a position to speculate on the anticipated operation of the Facility on behalf of the third party discussed in Section 3.1.2, FNT welcomes an open dialogue with NYSDEC to discuss the feasibility and implementation of reasonably available GHG mitigation strategies to enable the Facility's operations to remain consistent with the requirements of the CLCPA.





#### Annual Emission Statement

01/01/2020 - 12/31/2020

Owner:	FORTISTAR NORTH TONAWANDA INC	Facility:	FORTISTAR NORTH TONAWANDA INC
	1070 ERIE AVE		1070 ERIE AVE
	NORTH TONAWANDA, NY 14120		NORTH TONAWANDA, NY 14120
ATTN:	DANIEL ROTUNNO	DEC ID:	9-2912-00059

## Section 1 – Facility Fuel Use

Fuel Type	Quantity	Unit	Sulfur Average (%)	Ash Average (%)	Heat Value (MMBTU/Unit)
NUMBER 2 OIL	1.843	1000 GALLONS	0.038	0.01	138
NATURAL GAS	1.86949	MILLION CUBIC FEET	0.001	0	1

## Section 2 – Process Emissions

#### Process Data:

	Process ID:	001		Process Type:	Combustion/Incineration			
	SCC:	1-02-005-01 IND: >100MMBTU, 1&2 OIL		Emission Unit:	U-00001			
	SCC Description:	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL						
		INDUSTRIAL BOILER - DISTILLATE OIL						
		IND BOILER >100 MMBTU/HR - Grades 1 Oil	and 2					
	Fuel Type:	NUMBER 2 OIL		Annual Throughput:	0.00000			
	Process Description:			Throughput Units:	1000 GALLONS BURNED			
Em	ission Point Identifier	S						
N/A								
Op	erational Data:							
	Annual Averages							
	0 hours per day	0 days per week	0 weeks	per year				
	Seasonal Operation (%)	<u>)</u>						
	25% from Dec - Feb	25% from Mar - May	25% from	n Jun - Aug	25% from Sep - Nov			
	Peak Ozone Season Av	verages (June, July, and August)						
	0 days per week	0 days per week	0 total da	ys				
	Carbon Monoxide Season Averages (December, January, and February)							
	0 hours per day	0 days per week	0 total da	ys				
Co	ntaminant Data:							

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	CONTINUOUS STACK MONITORING				
2	007446-09-5	SULFUR DIOXIDE	0.00000	PUBLISHED EMISSION FACTORS	4.63287	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	1.66800	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	CONTINUOUS STACK MONITORING				
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	0.05699	AP-42		
	Process ID:	E01 (EXEMPT) (NOT REPORTED)		Process Type:	Industrial			
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	SCC:	4-04-001-21 BLK-PST-FRT(DI)-DIESEL-		Emission Unit:	E-10001			
	SCC Description:	BULK TERMINALS/PLANTS						
		BULK TERMINALS						
		FIXED ROOF TANKS (TANK DIA INDEPENDANT)-DIESEL FUEL-STANDING LOSS	6					
	Fuel Type:			Annual Throughput:				
	Process Description:	Distillate Fuel Oil Tank for # 2 oil		Throughput Units:	1000 GALLONS STORED			
Emi	ssion Point Identifiers	3						
N/A								
Оре	erational Data:							
	Annual Averages							
	hours per day	days per week	weeks pe	er year				
	Seasonal Operation (%)							
	% from Dec - Feb	% from Mar - May	% from Ju	un - Aug	% from Sep - Nov			
	Peak Ozone Season Av	erages (June, July, and August)						
	days per week	days per week	total days	S				
	Carbon Monoxide Seaso	on Averages (December, January, and Februa	ary)					
	hours per day	days per week	total days	S				

### Process Data:

	Process ID:	E02 (EXEMPT)		Process Type:	Industrial
	SCC:	4-04-001-22 BULK-PST-FIX(IND)-DIESEL-		Emission Unit:	E-10001
	SCC Description:	BULK TERMINALS/PLANTS			
		BULK TERMINALS			
		FIXED ROOF TANKS (TANK DIAMETER INDEPENDANT)-DIESEL FUEL-WORKING			
	Fuel Type:			Annual Throughput:	0.00000
	Process Description:	Storage Tank for # 2 oil		Throughput Units:	1000 GALLONS STORED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	0 hours per day	0 days per week	0 weeks	oer year	
	Seasonal Operation (%)				
	25% from Dec - Feb	25% from Mar - May	25% from	i Jun - Aug	25% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	0 days per week	0 days per week	0 total da	ys	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)		
	0 hours per day	0 days per week	0 total da	ys	
_					

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	BEST ENGINEERING JUDGEMENT				

	Process ID:	P09		Process Type:	Combustion/Incineration
	SCC:	1-01-006-02 UTIL.<100 MBTU/HR (NO		Emission Unit:	U-00004
	SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION			
		ELECTRIC UTILITY BOILER - NATURAL G	SAS		
		Boilers < 100 MBtu/Hr except Tangential			
	Fuel Type:	NATURAL GAS		Annual Throughput:	0.00000
	Process Description:	Natural gas combustion in steam boiler.		Throughput Units:	MILLION CUBIC FEET BURNED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	0 hours per day	0 days per week	0 weeks p	ber year	
	Seasonal Operation (%)				
	25% from Dec - Feb	25% from Mar - May	25% from	Jun - Aug	25% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	0 days per week	0 days per week	0 total da	ys	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)		

0 hours per day	0 days per week	0 total days
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Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	PUBLISHED EMISSION FACTORS	84.00000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	0.00000	PUBLISHED EMISSION FACTORS	0.60000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	7.60000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	PUBLISHED EMISSION FACTORS	50.00000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	5.50000	AP-42		

### Process Data:

Process ID:	PO1	Process Type:	Combustion/Incineration
SCC:	2-01-002-01 ELE.GEN:NATURAL GAS-	Emission Unit:	U-00001
SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION		
	ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS		
	Turbine		
Fuel Type:	NATURAL GAS	Annual Throughput:	0.18695
Process Description:	Natural gas combustion in combustion turbine.	Throughput Units:	MILLION CUBIC FEET BURNED

#### **Emission Point Identifiers**

N/A

### Operational Data:

lational Batal			
Annual Averages			
20 hours per day	1 days per week	3 weeks per year	
Seasonal Operation (%)			
0% from Dec - Feb	0% from Mar - May	100% from Jun - Aug	0% from Sep - Nov
Peak Ozone Season Aver	ages (June, July, and August)		
20 days per week	1 days per week	3 total days	
Carbon Monoxide Season	Averages (December, January, and	February)	
0 hours per day	0 days per week	0 total days	

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	24,146,000.0000 0	BEST ENGINEERING JUDGEMENT				
2	007446-09-5	SULFUR DIOXIDE	0.60944	PUBLISHED EMISSION FACTORS	3.25992	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	1.25854	PUBLISHED EMISSION FACTORS	6.73200	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	12,881.00000	CONTINUOUS STACK MONITORING				
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.40044	PUBLISHED EMISSION FACTORS	2.14200	AP-42		

### Process Data:

Process ID:	PO3	Process Type:	Combustion/Incineration
SCC:	1-01-006-02 UTIL.<100 MBTU/HR (NO	Emission Unit:	U-00001
SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION		
	ELECTRIC UTILITY BOILER - NATURAL C	GAS	
	Boilers < 100 MBtu/Hr except Tangential		
Fuel Type:	NATURAL GAS	Annual Throughput:	0.00000
Process Description:	Natural gas combustion in auxiliary boiler.	Throughput Units:	MILLION CUBIC FEET BURNED
Emission Point Identifier	S		
N/A			
Operational Data:			
Annual Averages			
0 hours per day	0 days per week	0 weeks per year	
Seasonal Operation (%	<u>)</u>		
25% from Dec - Feb	25% from Mar - May	25% from Jun - Aug	25% from Sep - Nov
Peak Ozone Season Av	verages (June, July, and August)		
0 days per week	0 days per week	0 total days	
Carbon Monoxide Seas	on Averages (December, January, and Febru	Jary)	
0 hours per day	0 days per week	0 total days	
Carbon Monoxide Seas 0 hours per day	on Averages (December, January, and Febru 0 days per week	uary) 0 total days	

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	PUBLISHED EMISSION FACTORS	84.00000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	0.00000	PUBLISHED EMISSION FACTORS	0.60000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	7.60000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	PUBLISHED EMISSION FACTORS	100.00000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	5.50000	AP-42		

### Process Data:

	Process ID:	PO4	Process Type:	Combustion/Incineration
	SCC:	1-01-005-01 UTIL:GRDES 1&2 OIL-NORM	Emission Unit:	U-00001
	SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION		
		ELECTRIC UTILITY BOILER - DISTILLATE	OIL	
		Grades 1 and 2 Oil		
	Fuel Type:	NUMBER 2 OIL	Annual Throughput	: 0.00000
	Process Description:	Distillate oil combustion in auxiliary boiler.	Throughput Units:	1000 GALLONS BURNED
Emi	ssion Point Identifiers	3		
N/A				
Оре	erational Data:			
	Annual Averages			
	0 hours per day	0 days per week	0 weeks per year	
	Seasonal Operation (%)			
	25% from Dec - Feb	25% from Mar - May	25% from Jun - Aug	25% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)		
	0 days per week	0 days per week	0 total days	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)	
	0 hours per day	0 days per week	0 total days	

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	STACK TEST OF EMISSIONS	0.01400	CUSTOM		
2	007446-09-5	SULFUR DIOXIDE	0.00000	MATERIAL BALANCE CALCULATIONS OR FUEL ANALYSIS				
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	STACK TEST OF EMISSIONS	0.00300	CUSTOM		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	STACK TEST OF EMISSIONS	1.78000	CUSTOM		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	STACK TEST OF EMISSIONS	0.09000	CUSTOM		

	Process ID:	P07		Process Type:	Combustion/Incineration			
	SCC:	2-01-001-02 ELE.GEN:DIST.OIL-		Emission Unit:	U-00002			
	SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION						
		ELECTRIC UTILITY INTERNAL COMBUST ENGINE - DISTILLATE OIL (DIESEL)	ION					
		Reciprocating						
	Fuel Type:	NUMBER 2 OIL		Annual Throughput:	1.73500			
	Process Description:	Distillate oil combustion in diesel emergency generator (primary).	/	Throughput Units:	1000 GALLONS BURNED			
Emi	ssion Point Identifiers	3						
N/A								
Оре	erational Data:							
	Annual Averages							
	4 hours per day	1 days per week	1 weeks p	ber year				
	Seasonal Operation (%)							
	0% from Dec - Feb	0% from Mar - May	100% froi	m Jun - Aug	0% from Sep - Nov			
	Peak Ozone Season Av	erages (June, July, and August)						
	4 days per week	1 days per week	1 total da	ys				
	Carbon Monoxide Season Averages (December, January, and February)							
	0 hours per day	0 days per week	0 total da	ys				
Cor	ntaminant Data:							

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	229.10675	PUBLISHED EMISSION FACTORS	132.05000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	69.93785	PUBLISHED EMISSION FACTORS	40.31000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	74.76115	PUBLISHED EMISSION FACTORS	43.09000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	1,063.53765	PUBLISHED EMISSION FACTORS	612.99000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	84.40775	PUBLISHED EMISSION FACTORS	48.65000	AP-42		

	Process ID:	PO8		Process Type:	Combustion/Incineration
	SCC:	2-01-001-02 ELE.GEN:DIST.OIL-		Emission Unit:	U-00003
	SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION			
		ELECTRIC UTILITY INTERNAL COMBUS ENGINE - DISTILLATE OIL (DIESEL)	ΓΙΟΝ		
		Reciprocating			
	Fuel Type:	NUMBER 2 OIL		Annual Throughput:	0.01080
	Process Description:	Distillate oil combustion in starting diesel er (secondary).	ngine	Throughput Units:	1000 GALLONS BURNED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	1 hours per day	1 days per week	1 weeks p	ber year	
	Seasonal Operation (%)				
	0% from Dec - Feb	0% from Mar - May	100% fro	m Jun - Aug	0% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	1 days per week	1 days per week	1 total da	ys	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	uary)		
	0 hours per day	0 days per week	0 total da	ys	
Cor	ntaminant Data:				

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	1.42614	PUBLISHED EMISSION FACTORS	132.05000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	0.43535	PUBLISHED EMISSION FACTORS	40.31000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.46537	PUBLISHED EMISSION FACTORS	43.09000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	6.62029	PUBLISHED EMISSION FACTORS	612.99000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.52542	PUBLISHED EMISSION FACTORS	48.65000	AP-42		



### **Annual Emission Statement**

01/01/2021 - 12/31/2021

Owner:	FORTISTAR NORTH TONAWANDA INC	Facility:	FORTISTAR NORTH TONAWANDA INC
	1070 ERIE AVE		1070 ERIE AVE
	NORTH TONAWANDA, NY 14120		NORTH TONAWANDA, NY 14120
ATTN:	DANIEL ROTUNNO	DEC ID:	9-2912-00059

# Section 1 – Facility Fuel Use

Fuel Type	Quantity	Unit	Sulfur Average (%)	Ash Average (%)	Heat Value (MMBTU/Unit)
NUMBER 2 OIL	0	1000 GALLONS	0.038	0.01	138
NATURAL GAS	0.48172	MILLION CUBIC FEET	0.001	0	1

	Process ID:	001		Process Type:	Combustion/Incineration			
	SCC:	1-02-005-01 IND: >100MMBTU, 1&2 OIL		Emission Unit:	U-00001			
	SCC Description:	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL						
		INDUSTRIAL BOILER - DISTILLATE OIL						
		IND BOILER >100 MMBTU/HR - Grades 1 Oil	and 2					
	Fuel Type:	NUMBER 2 OIL		Annual Throughput:	0.00000			
	Process Description:			Throughput Units:	1000 GALLONS BURNED			
Em	ission Point Identifier	S						
N/A								
Op	erational Data:							
	Annual Averages							
	0 hours per day	0 days per week	0 weeks	per year				
	Seasonal Operation (%)	<u>)</u>						
	25% from Dec - Feb	25% from Mar - May	25% from	n Jun - Aug	25% from Sep - Nov			
	Peak Ozone Season Av	verages (June, July, and August)						
	0 days per week	0 days per week	0 total da	ys				
	Carbon Monoxide Season Averages (December, January, and February)							
	0 hours per day	0 days per week	0 total da	ys				
Co	ntaminant Data:							

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	CONTINUOUS STACK MONITORING				
2	007446-09-5	SULFUR DIOXIDE	0.00000	PUBLISHED EMISSION FACTORS	4.63287	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	1.66800	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	CONTINUOUS STACK MONITORING				
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	0.05699	AP-42		

	Process ID:	E01 (EXEMPT) (NOT REPORTED)		Process Type:	Industrial
	SCC:	4-04-001-21 BLK-PST-FRT(DI)-DIESEL-		Emission Unit:	E-10001
	SCC Description:	BULK TERMINALS/PLANTS			
		BULK TERMINALS			
		FIXED ROOF TANKS (TANK DIA INDEPENDANT)-DIESEL FUEL-STANDING LOSS	6		
	Fuel Type:			Annual Throughput:	
	Process Description:	Distillate Fuel Oil Tank for # 2 oil		Throughput Units:	1000 GALLONS STORED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	hours per day	days per week	weeks pe	er year	
	Seasonal Operation (%)				
	% from Dec - Feb	% from Mar - May	% from Ju	un - Aug	% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	days per week	days per week	total days	S	
	Carbon Monoxide Seaso	on Averages (December, January, and Februa	ary)		
	hours per day	days per week	total days	S	

	Process ID:	E02 (EXEMPT) (NOT REPORTED)		Process Type:	Industrial
	SCC:	4-04-001-22 BULK-PST-FIX(IND)-DIESEL-		Emission Unit:	E-10001
	SCC Description:	BULK TERMINALS/PLANTS			
		BULK TERMINALS			
		FIXED ROOF TANKS (TANK DIAMETER INDEPENDANT)-DIESEL FUEL-WORKING			
	Fuel Type:			Annual Throughput:	
	Process Description:	Storage Tank for # 2 oil		Throughput Units:	1000 GALLONS STORED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	hours per day	days per week	weeks pe	er year	
	Seasonal Operation (%)				
	% from Dec - Feb	% from Mar - May	% from Ju	un - Aug	% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	days per week	days per week	total day	S	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)		
	hours per day	days per week	total day	S	

### Process Data:

	Process ID:	P09		Process Type:	Combustion/Incineration
	SCC:	1-01-006-02 UTIL.<100 MBTU/HR (NO		Emission Unit:	U-00004
	SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION			
		ELECTRIC UTILITY BOILER - NATURAL	GAS		
		Boilers < 100 MBtu/Hr except Tangential			
	Fuel Type:	NATURAL GAS		Annual Throughput:	0.00000
	Process Description:	Natural gas combustion in steam boiler.		Throughput Units:	MILLION CUBIC FEET BURNED
Emi	ssion Point Identifiers	8			
N/A					
Ope	rational Data:				
	Annual Averages				
	0 hours per day	0 days per week	0 weeks p	ber year	
	Seasonal Operation (%)				
	25% from Dec - Feb	25% from Mar - May	25% from	Jun - Aug	25% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	0 days per week	0 days per week	0 total day	ys	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	uary)		
	0 hours per day	0 days per week	0 total day	ys	

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	PUBLISHED EMISSION FACTORS	84.00000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	0.00000	PUBLISHED EMISSION FACTORS	0.60000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	7.60000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	PUBLISHED EMISSION FACTORS	50.00000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	5.50000	AP-42		

### Process Data:

Process ID:	PO1	Process Type:	Combustion/Incineration
SCC:	2-01-002-01 ELE.GEN:NATURAL GAS-	Emission Unit:	U-00001
SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION		
	ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS		
	Turbine		
Fuel Type:	NATURAL GAS	Annual Throughput:	0.48094
Process Description:	Natural gas combustion in combustion turbine.	Throughput Units:	MILLION CUBIC FEET BURNED

#### **Emission Point Identifiers**

N/A

### Operational Data:

Annual Averages								
10 hours per day	2 days per week	6 weeks per year						
Seasonal Operation (%)								
25% from Dec - Feb	0% from Mar - May	50% from Jun - Aug	25% from Sep - Nov					
Peak Ozone Season Avera	Peak Ozone Season Averages (June, July, and August)							
19 days per week	2 days per week	5 total days						
Carbon Monoxide Season Averages (December, January, and February)								
3 hours per day	1 days per week	3 total days						

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	2,885.37000	BEST ENGINEERING JUDGEMENT				
2	007446-09-5	SULFUR DIOXIDE	0.15678	PUBLISHED EMISSION FACTORS	3.25992	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.32377	PUBLISHED EMISSION FACTORS	6.73200	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	5,466.60000	CONTINUOUS STACK MONITORING				
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.10302	PUBLISHED EMISSION FACTORS	2.14200	AP-42		

### Process Data:

	Process ID:	PO3		Process Type:	Combustion/Incineration
	SCC:	1-01-006-02 UTIL.<100 MBTU/HR (NO		Emission Unit:	U-00001
	SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION			
		ELECTRIC UTILITY BOILER - NATURAL C	SAS		
		Boilers < 100 MBtu/Hr except Tangential			
	Fuel Type:	NATURAL GAS		Annual Throughput:	0.00078
	Process Description:	Natural gas combustion in auxiliary boiler.		Throughput Units:	MILLION CUBIC FEET BURNED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	17 hours per day	1 days per week	2 weeks p	per year	
	Seasonal Operation (%)				
	50% from Dec - Feb	0% from Mar - May	50% from	Jun - Aug	0% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	17 days per week	1 days per week	1 total day	/S	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	iary)		
	17 hours per day	1 days per week	1 total day	/S	
-					

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.06552	PUBLISHED EMISSION FACTORS	84.00000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	0.00047	PUBLISHED EMISSION FACTORS	0.60000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00593	PUBLISHED EMISSION FACTORS	7.60000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.07800	PUBLISHED EMISSION FACTORS	100.00000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00429	PUBLISHED EMISSION FACTORS	5.50000	AP-42		

### Process Data:

	Process ID:	PO4	Process Type:	Combustion/Incineration
	SCC:	1-01-005-01 UTIL:GRDES 1&2 OIL-NORM	Emission Unit:	U-00001
	SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION		
		ELECTRIC UTILITY BOILER - DISTILLATE	OIL	
		Grades 1 and 2 Oil		
	Fuel Type:	NUMBER 2 OIL	Annual Throughput	: 0.00000
	Process Description:	Distillate oil combustion in auxiliary boiler.	Throughput Units:	1000 GALLONS BURNED
Emi	ssion Point Identifiers	3		
N/A				
Оре	erational Data:			
	Annual Averages			
	0 hours per day	0 days per week	0 weeks per year	
	Seasonal Operation (%)			
	25% from Dec - Feb	25% from Mar - May	25% from Jun - Aug	25% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)		
	0 days per week	0 days per week	0 total days	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)	
	0 hours per day	0 days per week	0 total days	

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	STACK TEST OF EMISSIONS	0.01400	CUSTOM		
2	007446-09-5	SULFUR DIOXIDE	0.00000	MATERIAL BALANCE CALCULATIONS OR FUEL ANALYSIS				
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	STACK TEST OF EMISSIONS	0.00300	CUSTOM		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	STACK TEST OF EMISSIONS	1.78000	CUSTOM		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	STACK TEST OF EMISSIONS	0.09000	CUSTOM		

	Process ID:	PO7		Process Type:	Combustion/Incineration
	SCC:	2-01-001-02 ELE.GEN:DIST.OIL-		Emission Unit:	U-00002
	SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION			
		ELECTRIC UTILITY INTERNAL COMBUST ENGINE - DISTILLATE OIL (DIESEL)	ΓΙΟΝ		
		Reciprocating			
	Fuel Type:	NUMBER 2 OIL		Annual Throughput:	0.18460
	Process Description:	Distillate oil combustion in diesel emergenc generator (primary).	у	Throughput Units:	1000 GALLONS BURNED
Emi	ssion Point Identifiers	8			
N/A					
Оре	erational Data:				
	Annual Averages				
	6 hours per day	1 days per week	2 weeks	per year	
	Seasonal Operation (%)	<u>.</u>			
	0% from Dec - Feb	0% from Mar - May	100% fro	m Jun - Aug	0% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	6 days per week	1 days per week	2 total da	iys	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	iary)		
	0 hours per day	0 days per week	0 total da	iys	
Cor	ntaminant Data:				

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	24.37643	PUBLISHED EMISSION FACTORS	132.05000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	7.44123	PUBLISHED EMISSION FACTORS	40.31000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	7.95441	PUBLISHED EMISSION FACTORS	43.09000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	113.15795	PUBLISHED EMISSION FACTORS	612.99000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	8.98079	PUBLISHED EMISSION FACTORS	48.65000	AP-42		

	Process ID:	PO8		Process Type:	Combustion/Incineration	
	SCC:	2-01-001-02 ELE.GEN:DIST.OIL-		Emission Unit:	U-00003	
	SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION				
		ELECTRIC UTILITY INTERNAL COMBUS ENGINE - DISTILLATE OIL (DIESEL)	ΓΙΟΝ			
		Reciprocating				
	Fuel Type:	NUMBER 2 OIL		Annual Throughput:	t: 0.00610	
	Process Description:	Distillate oil combustion in starting diesel er (secondary).	ngine	Throughput Units:	1000 GALLONS BURNED	
Emi	ssion Point Identifiers	3				
N/A						
Ope	erational Data:					
	Annual Averages					
	1 hours per day	1 days per week	10 weeks	s per year		
	Seasonal Operation (%)					
	25% from Dec - Feb	0% from Mar - May	50% from	n Jun - Aug	25% from Sep - Nov	
	Peak Ozone Season Av	erages (June, July, and August)				
	1 days per week	1 days per week	3 total da	ys		
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	uary)			
	1 hours per day	2 days per week	3 total da	ys		
Cor	ntaminant Data:					

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.80550	PUBLISHED EMISSION FACTORS	132.05000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	0.24589	PUBLISHED EMISSION FACTORS	40.31000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.26285	PUBLISHED EMISSION FACTORS	43.09000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	3.73924	PUBLISHED EMISSION FACTORS	612.99000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.29676	PUBLISHED EMISSION FACTORS	48.65000	AP-42		



### Annual Emission Statement

01/01/2022 - 12/31/2022

Owner:	FORTISTAR NORTH TONAWANDA INC	Facility:	FORTISTAR NORTH TONAWANDA INC
	1070 ERIE AVE		1070 ERIE AVE
	NORTH TONAWANDA, NY 14120		NORTH TONAWANDA, NY 14120
ATTN:	DANIEL ROTUNNO	DEC ID:	9-2912-00059

# Section 1 – Facility Fuel Use

Fuel Type	Quantity	Unit	Sulfur Average (%)	Ash Average (%)	Heat Value (MMBTU/Unit)
NUMBER 2 OIL	1.104	1000 GALLONS	0.038	0.01	138
NATURAL GAS	0.5066	MILLION CUBIC FEET	0.001	0	1

	Process ID:	001		Process Type:	Combustion/Incineration		
	SCC:	1-02-005-01 IND: >100MMBTU, 1&2 OIL		Emission Unit:	U-00001		
	SCC Description:	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL					
		INDUSTRIAL BOILER - DISTILLATE OIL					
		IND BOILER >100 MMBTU/HR - Grades 1 Oil	and 2				
	Fuel Type:	NUMBER 2 OIL		Annual Throughput:	0.00000		
	Process Description:			Throughput Units:	1000 GALLONS BURNED		
Em	ission Point Identifier	S					
N/A							
Op	erational Data:						
	Annual Averages						
	0 hours per day	0 days per week	0 weeks	oer year			
	Seasonal Operation (%)	<u>)</u>					
	25% from Dec - Feb	25% from Mar - May	25% from	i Jun - Aug	25% from Sep - Nov		
	Peak Ozone Season Av	verages (June, July, and August)					
	0 days per week	0 days per week	0 total da	ys			
	Carbon Monoxide Season Averages (December, January, and February)						
	0 hours per day	0 days per week	0 total da	ys			
Со	ntaminant Data:						

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	CONTINUOUS STACK MONITORING				
2	007446-09-5	SULFUR DIOXIDE	0.00000	PUBLISHED EMISSION FACTORS	4.63287	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	1.66800	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	CONTINUOUS STACK MONITORING				
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	0.05699	AP-42		

	Process ID:	E01 (EXEMPT) (NOT REPORTED)		Process Type:	Industrial
	SCC:	4-04-001-21 BLK-PST-FRT(DI)-DIESEL-		Emission Unit:	E-10001
	SCC Description:	BULK TERMINALS/PLANTS			
		BULK TERMINALS			
		FIXED ROOF TANKS (TANK DIA INDEPENDANT)-DIESEL FUEL-STANDING LOSS	ì		
	Fuel Type:			Annual Throughput:	
	Process Description:	Distillate Fuel Oil Tank for # 2 oil		Throughput Units:	1000 GALLONS STORED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	hours per day	days per week	weeks pe	er year	
	Seasonal Operation (%)				
	% from Dec - Feb	% from Mar - May	% from Ju	un - Aug	% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	days per week	days per week	total days	S	
	Carbon Monoxide Seaso	on Averages (December, January, and Februa	ary)		
	hours per day	days per week	total days	S	

	Process ID:	E02 (EXEMPT) (NOT REPORTED)		Process Type:	Industrial
	SCC:	4-04-001-22 BULK-PST-FIX(IND)-DIESEL-		Emission Unit:	E-10001
	SCC Description:	BULK TERMINALS/PLANTS			
		BULK TERMINALS			
		FIXED ROOF TANKS (TANK DIAMETER INDEPENDANT)-DIESEL FUEL-WORKING			
	Fuel Type:			Annual Throughput:	
	Process Description:	Storage Tank for # 2 oil		Throughput Units:	1000 GALLONS STORED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	hours per day	days per week	weeks pe	er year	
	Seasonal Operation (%)				
	% from Dec - Feb	% from Mar - May	% from Ju	un - Aug	% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	days per week	days per week	total day	S	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)		
	hours per day	days per week	total day	S	
### Process Data:

	Process ID:	P09		Process Type:	Combustion/Incineration	
	SCC:	1-01-006-02 UTIL.<100 MBTU/HR (NO		Emission Unit:	U-00004	
	SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION				
		ELECTRIC UTILITY BOILER - NATURAL	GAS			
		Boilers < 100 MBtu/Hr except Tangential				
	Fuel Type:	NATURAL GAS		Annual Throughput:	0.00000	
	Process Description:	Natural gas combustion in steam boiler.		Throughput Units:	MILLION CUBIC FEET BURNED	
Emi	ssion Point Identifiers	8				
N/A						
Ope	rational Data:					
	Annual Averages					
	0 hours per day	0 days per week	0 weeks p	ber year		
	Seasonal Operation (%)					
	25% from Dec - Feb	25% from Mar - May	25% from	Jun - Aug	25% from Sep - Nov	
	Peak Ozone Season Av	erages (June, July, and August)				
	0 days per week	0 days per week	0 total day	ys		
	Carbon Monoxide Season Averages (December, January, and February)					
	0 hours per day	0 days per week	0 total day	ys		

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	PUBLISHED EMISSION FACTORS	84.00000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	0.00000	PUBLISHED EMISSION FACTORS	0.60000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	7.60000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	PUBLISHED EMISSION FACTORS	50.00000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	5.50000	AP-42		

### Process Data:

Process ID:	PO1	Process Type:	Combustion/Incineration
SCC:	2-01-002-01 ELE.GEN:NATURAL GAS-	Emission Unit:	U-00001
SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION		
	ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS		
	Turbine		
Fuel Type:	NATURAL GAS	Annual Throughput:	0.50302
Process Description:	Natural gas combustion in combustion turbine.	Throughput Units:	MILLION CUBIC FEET BURNED

### **Emission Point Identifiers**

N/A

### Operational Data:

oradonal Data.							
Annual Averages							
20 hours per day	1 days per week	k 7 weeks per year					
Seasonal Operation (%)							
77% from Dec - Feb	6% from Mar - May	11% from Jun - Aug 6% from Sep - I					
Peak Ozone Season Avera	ges (June, July, and August)						
20 days per week	1 days per week	5 total days					
Carbon Monoxide Season A	Averages (December, January, and	February)					
20 hours per day	1 days per week	37 total days					

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	14.40000	BEST ENGINEERING JUDGEMENT				
2	007446-09-5	SULFUR DIOXIDE	1.63980	PUBLISHED EMISSION FACTORS	3.25992	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	3.38633	PUBLISHED EMISSION FACTORS	6.73200	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00120	CONTINUOUS STACK MONITORING				
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	1.07747	PUBLISHED EMISSION FACTORS	2.14200	AP-42		

### Process Data:

	Process ID:	PO3		Process Type:	Combustion/Incineration
	SCC:	1-01-006-02 UTIL.<100 MBTU/HR (NO		Emission Unit:	U-00001
	SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION			
		ELECTRIC UTILITY BOILER - NATURAL G	SAS		
		Boilers < 100 MBtu/Hr except Tangential			
	Fuel Type:	NATURAL GAS		Annual Throughput:	0.00358
	Process Description:	Natural gas combustion in auxiliary boiler.		Throughput Units:	MILLION CUBIC FEET BURNED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	24 hours per day	2 days per week	1 weeks p	er year	
	Seasonal Operation (%)				
	100% from Dec - Feb	0% from Mar - May	0% from J	un - Aug	0% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	0 days per week	0 days per week	0 total day	'S	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)		
	24 hours per day	2 days per week	1 total day	'S	
<u> </u>					

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.30047	PUBLISHED EMISSION FACTORS	84.00000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	0.00215	PUBLISHED EMISSION FACTORS	0.60000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.02719	PUBLISHED EMISSION FACTORS	7.60000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.35770	PUBLISHED EMISSION FACTORS	100.00000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.01967	PUBLISHED EMISSION FACTORS	5.50000	AP-42		

### Process Data:

	Process ID:	PO4	Process Type:	Combustion/Incineration			
	SCC:	1-01-005-01 UTIL:GRDES 1&2 OIL-NORM	Emission Unit:	U-00001			
	SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION					
		ELECTRIC UTILITY BOILER - DISTILLATE	OIL				
		Grades 1 and 2 Oil					
	Fuel Type:	NUMBER 2 OIL	IUMBER 2 OIL Annual Throughput:				
	Process Description:	Distillate oil combustion in auxiliary boiler.	Throughput Units:	1000 GALLONS BURNED			
Emi	ssion Point Identifiers	3					
N/A							
Оре	erational Data:						
	Annual Averages						
	0 hours per day	0 days per week	0 weeks per year				
	Seasonal Operation (%)						
	25% from Dec - Feb	25% from Mar - May	25% from Jun - Aug	25% from Sep - Nov			
	Peak Ozone Season Av	erages (June, July, and August)					
	0 days per week	0 days per week 0 total days					
	Carbon Monoxide Seaso	son Averages (December, January, and February)					
	0 hours per day	0 days per week	0 total days				

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	STACK TEST OF EMISSIONS	0.01400	CUSTOM		
2	007446-09-5	SULFUR DIOXIDE	0.00000	MATERIAL BALANCE CALCULATIONS OR FUEL ANALYSIS				
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	STACK TEST OF EMISSIONS	0.00300	CUSTOM		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	STACK TEST OF EMISSIONS	1.78000	CUSTOM		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	STACK TEST OF EMISSIONS	0.09000	CUSTOM		

	Process ID:	P07		Process Type:	Combustion/Incineration	
	SCC:	2-01-001-02 ELE.GEN:DIST.OIL-		Emission Unit:	U-00002	
	SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION				
		ELECTRIC UTILITY INTERNAL COMBUST ENGINE - DISTILLATE OIL (DIESEL)	ION			
		Reciprocating				
	Fuel Type:	NUMBER 2 OIL	UMBER 2 OIL Annual Through			
	Process Description:	Distillate oil combustion in diesel emergency generator (primary).	ý	Throughput Units:	1000 GALLONS BURNED	
Emi	ssion Point Identifiers	3				
N/A						
Оре	erational Data:					
	Annual Averages					
	1 hours per day	7 days per week	1 weeks p	ber year		
	Seasonal Operation (%)					
	37% from Dec - Feb	37% from Mar - May	23% from	i Jun - Aug	3% from Sep - Nov	
	Peak Ozone Season Av	erages (June, July, and August)				
	1 days per week	days per week 1 days per week 5 total days				
	Carbon Monoxide Season Averages (December, January, and February)					
	1 hours per day	1 days per week	3 total da	ys		
Cor	ntaminant Data:					

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	115.93990	PUBLISHED EMISSION FACTORS	132.05000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	35.39218	PUBLISHED EMISSION FACTORS	40.31000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	37.83302	PUBLISHED EMISSION FACTORS	43.09000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	538.20522	PUBLISHED EMISSION FACTORS	612.99000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	42.71470	PUBLISHED EMISSION FACTORS	48.65000	AP-42		

	Process ID:	PO8		Process Type:	Combustion/Incineration		
	SCC:	2-01-001-02 ELE.GEN:DIST.OIL-		Emission Unit:	U-00003		
	SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION					
		ELECTRIC UTILITY INTERNAL COMBUS ENGINE - DISTILLATE OIL (DIESEL)	TION				
		Reciprocating					
	Fuel Type:	UMBER 2 OIL Annual Through			0.22600		
	Process Description:	Distillate oil combustion in starting diesel er (secondary).	ngine	Throughput Units:	1000 GALLONS BURNED		
Emi	ssion Point Identifiers	3					
N/A							
Оре	erational Data:						
	Annual Averages						
	1 hours per day	1 days per week	1 weeks p	oer year			
	Seasonal Operation (%)						
	25% from Dec - Feb	0% from Mar - May	50% from	i Jun - Aug	25% from Sep - Nov		
	Peak Ozone Season Av	erages (June, July, and August)					
	1 days per week	1 days per week	4 total da	ys			
	Carbon Monoxide Season Averages (December, January, and February)						
	1 hours per day	1 days per week	3 total da	ys			
Cor	ntaminant Data:						

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	29.84330	PUBLISHED EMISSION FACTORS	132.05000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	9.11006	PUBLISHED EMISSION FACTORS	40.31000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	9.73834	PUBLISHED EMISSION FACTORS	43.09000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	138.53574	PUBLISHED EMISSION FACTORS	612.99000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	10.99490	PUBLISHED EMISSION FACTORS	48.65000	AP-42		



## Annual Emission Statement

01/01/2023 - 12/31/2023

Owner:	FORTISTAR NORTH TONAWANDA INC	Facility:	FORTISTAR NORTH TONAWANDA INC
	1070 ERIE AVE		1070 ERIE AVE
	NORTH TONAWANDA, NY 14120		NORTH TONAWANDA, NY 14120
ATTN:	DANIEL ROTUNNO	DEC ID:	9-2912-00059

# Section 1 – Facility Fuel Use

Fuel Type	Quantity	Unit	Sulfur Average (%)	Ash Average (%)	Heat Value (MMBTU/Unit)
NUMBER 2 OIL	0.846	1000 GALLONS	0.038	0.01	138
NATURAL GAS	0.64349	MILLION CUBIC FEET	0.001	0	1

	Process ID:	001		Process Type:	Combustion/Incineration
	SCC:	1-02-005-01 IND: >100MMBTU, 1&2 OIL		Emission Unit:	U-00001
	SCC Description:	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL			
		INDUSTRIAL BOILER - DISTILLATE OIL			
		IND BOILER >100 MMBTU/HR - Grades 1 Oil	and 2		
	Fuel Type:	NUMBER 2 OIL		Annual Throughput:	0.00000
	Process Description:			Throughput Units:	1000 GALLONS BURNED
Em	ission Point Identifier	S			
N/A					
Op	erational Data:				
	Annual Averages				
	0 hours per day	0 days per week	0 weeks	per year	
	Seasonal Operation (%)	<u>)</u>			
	25% from Dec - Feb	25% from Mar - May	25% from	n Jun - Aug	25% from Sep - Nov
	Peak Ozone Season Av	verages (June, July, and August)			
	0 days per week	0 days per week	0 total da	ys	
	Carbon Monoxide Seas	on Averages (December, January, and Febru	uary)		
	0 hours per day	0 days per week	0 total da	ys	
Co	ntaminant Data:				

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	CONTINUOUS STACK MONITORING				
2	007446-09-5	SULFUR DIOXIDE	0.00000	PUBLISHED EMISSION FACTORS	4.63287	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	1.66800	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	CONTINUOUS STACK MONITORING				
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	0.05699	AP-42		

	Process ID:	E01 (EXEMPT) (NOT REPORTED)		Process Type:	Industrial
	SCC:	4-04-001-21 BLK-PST-FRT(DI)-DIESEL-		Emission Unit:	E-10001
	SCC Description:	BULK TERMINALS/PLANTS			
		BULK TERMINALS			
		FIXED ROOF TANKS (TANK DIA INDEPENDANT)-DIESEL FUEL-STANDING LOSS	6		
	Fuel Type:			Annual Throughput:	
	Process Description:	Distillate Fuel Oil Tank for # 2 oil		Throughput Units:	1000 GALLONS STORED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	hours per day	days per week	weeks pe	er year	
	Seasonal Operation (%)				
	% from Dec - Feb	% from Mar - May	% from Ju	un - Aug	% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	days per week	days per week	total days	S	
	Carbon Monoxide Seaso	on Averages (December, January, and Februa	ary)		
	hours per day	days per week	total days	S	

	Process ID:	E02 (EXEMPT) (NOT REPORTED)		Process Type:	Industrial
	SCC:	4-04-001-22 BULK-PST-FIX(IND)-DIESEL-		Emission Unit:	E-10001
	SCC Description:	BULK TERMINALS/PLANTS			
		BULK TERMINALS			
		FIXED ROOF TANKS (TANK DIAMETER INDEPENDANT)-DIESEL FUEL-WORKING			
	Fuel Type:			Annual Throughput:	
	Process Description:	Storage Tank for # 2 oil		Throughput Units:	1000 GALLONS STORED
Emi	ssion Point Identifiers	3			
N/A					
Оре	erational Data:				
	Annual Averages				
	hours per day	days per week	weeks pe	er year	
	Seasonal Operation (%)				
	% from Dec - Feb	% from Mar - May	% from Ju	un - Aug	% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	days per week	days per week	total day	S	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)		
	hours per day	days per week	total day	S	

### Process Data:

	Process ID:	P09		Process Type:	Combustion/Incineration
	SCC:	1-01-006-02 UTIL.<100 MBTU/HR (NO		Emission Unit:	U-00004
	SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION			
		ELECTRIC UTILITY BOILER - NATURAL	GAS		
		Boilers < 100 MBtu/Hr except Tangential			
	Fuel Type:	NATURAL GAS		Annual Throughput:	0.00000
	Process Description:	Natural gas combustion in steam boiler.		Throughput Units:	MILLION CUBIC FEET BURNED
Emi	ssion Point Identifiers	8			
N/A					
Ope	rational Data:				
	Annual Averages				
	0 hours per day	0 days per week	0 weeks p	ber year	
	Seasonal Operation (%)				
	25% from Dec - Feb	25% from Mar - May	25% from	Jun - Aug	25% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	0 days per week	0 days per week	0 total day	ys	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	uary)		
	0 hours per day	0 days per week	0 total day	ys	

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	PUBLISHED EMISSION FACTORS	84.00000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	0.00000	PUBLISHED EMISSION FACTORS	0.60000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	7.60000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	PUBLISHED EMISSION FACTORS	50.00000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	5.50000	AP-42		

### Process Data:

Process ID:	PO1	Process Type:	Combustion/Incineration
SCC:	2-01-002-01 ELE.GEN:NATURAL GAS-	Emission Unit:	U-00001
SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION		
	ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - NATURAL GAS		
	Turbine		
Fuel Type:	NATURAL GAS	Annual Throughput:	0.64349
Process Description:	Natural gas combustion in combustion turbine.	Throughput Units:	MILLION CUBIC FEET BURNED

### **Emission Point Identifiers**

N/A

## Operational Data:

Annual Averages			
24 hours per day	7 days per week	9 weeks per year	
Seasonal Operation (%)			
11% from Dec - Feb	23% from Mar - May	14% from Jun - Aug	52% from Sep - Nov
Peak Ozone Season Avera	iges (June, July, and August)		
24 days per week	1 days per week	9 total days	
Carbon Monoxide Season	Averages (December, January, and	February)	
24 hours per day	1 days per week	7 total days	

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	22,829.01000	BEST ENGINEERING JUDGEMENT				
2	007446-09-5	SULFUR DIOXIDE	2.09774	PUBLISHED EMISSION FACTORS	3.25992	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	4.33199	PUBLISHED EMISSION FACTORS	6.73200	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	41,454.70000	CONTINUOUS STACK MONITORING				
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	1.37836	PUBLISHED EMISSION FACTORS	2.14200	AP-42		

### Process Data:

Process ID:	PO3	Process Type:	Combustion/Incineration
SCC:	1-01-006-02 UTIL.<100 MBTU/HR (NO	Emission Unit:	U-00001
SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION		
	ELECTRIC UTILITY BOILER - NATURAL G	BAS	
	Boilers < 100 MBtu/Hr except Tangential		
Fuel Type:	NATURAL GAS	Annual Throughput	: 0.00000
Process Description:	Natural gas combustion in auxiliary boiler.	Throughput Units:	MILLION CUBIC FEET BURNED
ssion Point Identifiers	3		
rational Data:			
Annual Averages			
0 hours per day	0 days per week	0 weeks per year	
Seasonal Operation (%)			
25% from Dec - Feb	25% from Mar - May	25% from Jun - Aug	25% from Sep - Nov
Peak Ozone Season Av	erages (June, July, and August)		
0 days per week	0 days per week	0 total days	
Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)	
0 hours per day	0 days per week	0 total days	
	Process ID: SCC: SCC Description: Fuel Type: Process Description: ssion Point Identifiers rational Data: <u>Annual Averages</u> 0 hours per day <u>Seasonal Operation (%)</u> 25% from Dec - Feb <u>Peak Ozone Season Av</u> 0 days per week <u>Carbon Monoxide Seaso</u> 0 hours per day	Process ID:PO3SCC:1-01-006-02 UTIL.<100 MBTU/HR (NO	Process ID: PO3 Process Type:   SCC: 1-01-006-2 UTIL.<100 MBTU/HR (NO

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	PUBLISHED EMISSION FACTORS	84.00000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	0.00000	PUBLISHED EMISSION FACTORS	0.60000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	7.60000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	PUBLISHED EMISSION FACTORS	100.00000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	PUBLISHED EMISSION FACTORS	5.50000	AP-42		

### Process Data:

	Process ID:	PO4	Process Type:	Combustion/Incineration
	SCC:	1-01-005-01 UTIL:GRDES 1&2 OIL-NORM.	Emission Unit:	U-00001
	SCC Description:	EXTERNAL COMBUSTION BOILERS - ELECTRIC GENERATION		
		ELECTRIC UTILITY BOILER - DISTILLATE	OIL	
		Grades 1 and 2 Oil		
	Fuel Type:	NUMBER 2 OIL	Annual Throughput	: 0.00000
	Process Description:	Distillate oil combustion in auxiliary boiler.	Throughput Units:	1000 GALLONS BURNED
Emi	ssion Point Identifiers	3		
N/A				
Оре	erational Data:			
	Annual Averages			
	0 hours per day	0 days per week	0 weeks per year	
	Seasonal Operation (%)			
	25% from Dec - Feb	25% from Mar - May	25% from Jun - Aug	25% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)		
	0 days per week	0 days per week	0 total days	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)	
	0 hours per day	0 days per week	0 total days	

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	0.00000	STACK TEST OF EMISSIONS	0.01400	CUSTOM		
2	007446-09-5	SULFUR DIOXIDE	0.00000	MATERIAL BALANCE CALCULATIONS OR FUEL ANALYSIS				
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	0.00000	STACK TEST OF EMISSIONS	0.00300	CUSTOM		
3	0NY210-00-0	OXIDES OF NITROGEN	0.00000	STACK TEST OF EMISSIONS	1.78000	CUSTOM		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	0.00000	STACK TEST OF EMISSIONS	0.09000	CUSTOM		

	Process ID:	PO7		Process Type:	Combustion/Incineration
	SCC:	2-01-001-02 ELE.GEN:DIST.OIL-		Emission Unit:	U-00002
	SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION			
		ELECTRIC UTILITY INTERNAL COMBUST ENGINE - DISTILLATE OIL (DIESEL)	ION		
		Reciprocating			
	Fuel Type:	NUMBER 2 OIL		Annual Throughput:	0.67900
	Process Description:	Distillate oil combustion in diesel emergency generator (primary).	/	Throughput Units:	1000 GALLONS BURNED
Emi	ssion Point Identifiers	8			
N/A					
Оре	erational Data:				
	Annual Averages				
	1 hours per day	1 days per week	1 weeks p	ber year	
	Seasonal Operation (%)				
	20% from Dec - Feb	0% from Mar - May	80% from	Jun - Aug	0% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	5 days per week	1 days per week	1 total da	ys	
	Carbon Monoxide Seaso	on Averages (December, January, and Febru	ary)		
	1 hours per day	1 days per week	1 total da	ys	
Cor	taminant Data:				

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	89.66195	PUBLISHED EMISSION FACTORS	132.05000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	27.37049	PUBLISHED EMISSION FACTORS	40.31000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	29.25811	PUBLISHED EMISSION FACTORS	43.09000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	416.22021	PUBLISHED EMISSION FACTORS	612.99000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	33.03335	PUBLISHED EMISSION FACTORS	48.65000	AP-42		

	Process ID:	PO8		Process Type:	Combustion/Incineration
	SCC:	2-01-001-02 ELE.GEN:DIST.OIL-		Emission Unit:	U-00003
	SCC Description:	INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION			
		ELECTRIC UTILITY INTERNAL COMBUS ENGINE - DISTILLATE OIL (DIESEL)	TION		
		Reciprocating			
	Fuel Type:	NUMBER 2 OIL		Annual Throughput:	0.16700
	Process Description:	Distillate oil combustion in starting diesel e (secondary).	ngine	Throughput Units:	1000 GALLONS BURNED
Emi	ssion Point Identifiers	5			
N/A					
Ope	erational Data:				
	Annual Averages				
	1 hours per day	1 days per week	5 weeks	oer year	
	Seasonal Operation (%)	-			
	23% from Dec - Feb	15% from Mar - May	23% from	n Jun - Aug	39% from Sep - Nov
	Peak Ozone Season Av	erages (June, July, and August)			
	1 days per week	1 days per week	3 total da	ys	
	Carbon Monoxide Seaso	on Averages (December, January, and Febr	uary)		
	1 hours per day	1 days per week	3 total da	ys	
Cor	ntaminant Data:				

Chemical Family	CAS Number	Contaminant Name	Actual Emission (lbs/yr)	How Determined	Emission Factor	Source	Cont. Eff. (%)	Cap. Eff. (%)
5	000630-08-0	CARBON MONOXIDE	22.05235	PUBLISHED EMISSION FACTORS	132.05000	AP-42		
2	007446-09-5	SULFUR DIOXIDE	6.73177	PUBLISHED EMISSION FACTORS	40.31000	AP-42		
1	0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	7.19603	PUBLISHED EMISSION FACTORS	43.09000	AP-42		
3	0NY210-00-0	OXIDES OF NITROGEN	102.36933	PUBLISHED EMISSION FACTORS	612.99000	AP-42		
4	0NY998-10-0	UNSPECIATED VOC ( EMISSION STATEMENT USE ONLY)	8.12455	PUBLISHED EMISSION FACTORS	48.65000	AP-42		