United States Environmental Protection Agency
Region 2
290 Broadway, 25 Floor
New York, NY 10007

July 15, 2025

STATEMENT OF BASIS

Air Pollution Control
Part 71 Title V Permit to Operate
for

Turning Stone Resort and Casino

Permit No. ONEIDA004

The purpose of this document, the statement of basis ("SOB") is to set forth the legal and factual basis for permit conditions, including references to applicable provisions of the Clean Air Act (CAA or Act) and implementing regulations. This document also briefly describes the derivation of conditions as required by 40 C.F.R. § 71.11(b).

1. EPA Authority to Issue Part 71 Permits

All major stationary sources of air pollution and certain other sources are required to apply for title V operating permits that include emission limitations and other conditions as necessary to assure compliance with applicable requirements of the Clean Air Act (CAA or Act), including the requirements of the applicable State Implementation Plan (SIP). CAA §§ 502(a) and 504(a). The title V operating permit program does not generally impose new substantive air quality control requirements (referred to as "applicable requirements"), but does require permits to contain monitoring, recordkeeping, reporting and other requirements to assure a source's compliance with applicable requirements. 57 Fed. Reg. 32250, 32251 (July 21, 1992). One purpose of the title V program is to "enable the source, States, EPA, and the public to understand better the requirements to which the source is subject, and whether the source is meeting those requirements." 57 Fed. Reg. at 32251. Thus the title V operating permit program is a vehicle for ensuring that air quality control requirements are appropriately applied to the source emission units and for assuring compliance with such requirements.

Part 71 programs for Indian country - The Administrator will administer and enforce an operating permits program in Indian country, as defined in § 71.2, when an operating permits program which meets the requirements of Part 70 of this chapter has not been explicitly granted

full or interim approval by the Administrator for Indian country, such as is the case for Oneida Indian Nation.

2. Facility Information and Description

Applicant and Stationary Source Information

Owner/Operator	Facility SIC/NAIC Code: 7011, Casino Hotels
Owner Oneida Indian Nation 5218 Patrick Road Street Verona, New York 13478 Operator Turning Stone Resort and Casino 5218 Patrick Road Street Verona, New York 13478	Facility Turning Stone Resort and Casino 5218 Patrick Road Street Verona, New York 13478

Responsible Official	Facility Contact
Michael Massena Environmental Manager Michael Massena 5218 Patrick Road Street Verona, New York 13478 Phone: 315-366-9647	Michael Massena Environmental Manager Michael Massena 5218 Patrick Road Street Verona, New York 13478 Phone: 315-366-9647

Facility Description

Turning Stone Resort and Casino ("facility" or "source") is a casino resort, which is located on Indian lands of ONEIDA Indian Nation, in Oneida County, New York ("NY') state, and it is owned by ONEIDA Indian Nation. The facility comprises of a central utility plant (gas fired turbine), heat/hot water boilers and backup diesel generators. The emission sources at the facility include the following: one natural gas-fired gas turbine generator with an unfired heat recovery steam generator ("HRSG"), three natural gas-fired boilers, one natural gas and distillate No.2 fuel oil-fired boiler, six diesel engine generators, and three diesel emergency engines. The facility also includes several small emission sources that are classified as insignificant activities or emission sources under 40 CFR § 71.5(c)(11).

Title V Major Source Status

The facility is a title V source because of its potential to emit nitrogen oxide ("NO_x") emissions of 159.42 tons per year ("tpy"), which is greater than the major source threshold of 100 tpy.[1]

Area Classification - Local Air Quality and Attainment Status

The facility is located on Indian country lands within the boundaries of the Oneida Indian Nation, Oneida Indian Reservation, in Oneida County, NY, which is in attainment/unclassifiable for all criteria pollutants. The facility is located in NY State and within 50 miles of the Onondaga Indian Nation.

Tribal Reservation Contact:

Michael Massena
Environmental Manager
5218 Patrick Road Street
Verona, New York 13478
Phone: 315-366-9647

Identification of Emissions Generating Activities

All emission generating activities or emission units, and any control devices employed by each emission unit are identified in Table 1 below. The activities that qualify as "insignificant" activities or emission sources for the purposes of 40 CFR Part 71 are identified in Table 2 below.

[1]40 C.F.R. § 71.3(a)(1) provides that all major stationary sources are required to obtain a Title V operating permit. "Major source" is defined in 40 C.F.R. § 71.2 as any stationary source belonging to a single major industrial grouping that directly emits, or has the potential to emit, 100 tons per year or more of any criteria pollutant, or 10/25 tons per year of a single HAP or total HAP emissions, respectively.

Table 1. **Emission Units**

Emission Unit ID	Equipment ID	Stack ID	Description	Control Device
ES 001	GT 001	S 001 or S 002	Natural Gas fired Gas Turbine Generator with HRSG- Solar/Taurus 60-7800S	Lean Pre-mix Low NOx
ES 002	BL 001	S 003	Natural Gas fired Boiler- Cleaver Brooks CEW-LN 200-800-200	Low NOx FGR
ES 003	BL 002	S 004	Natural Gas/No. 2 Oil fired Boiler- Cleaver Brooks CEW-LN 200-800-200	Low NOx FGR
ES 004	BL 003	S 005	Natural Gas fired boiler- Cleaver Brooks CB1 700-500-125	None
ES 004	BL 004	S 006	Natural Gas fired boiler- Cleaver Brooks CB1 700-500-125	None
ES 005	GL 001	S 007	Backup Diesel Generator (>600 HP)- Cummins 1500 DFLE	None
ES 005	GL 003	S 009	Backup Diesel Generator (>600 HP)- Caterpillar 3412C	None
ES 005	GL 004	S 010	Backup Diesel Generator (>600 HP)- Detroit Diesel 1500 DSEB	None
ES 005	GL 005	S 014	Emergency Diesel Generator- >600 HP- Cummins 500 DFEK	None

Table 1. Continued

Emission Unit ID	Equipment ID	Stack ID	Description	Control Device
ES 005	GL 006	S015	Emergency Spark Ignition Natural Gas Generator- (>600 HP) Cummins 450 GFGA	None
ES 006	GS 001	S 011	Backup Diesel Generator (<600 HP)- Elliot Magnetek 300RD	None
ES 006	GS 002	S 012	Backup Diesel Generator (<600 HP)- Detroit Diesel 350 DSE	None
ES 006	GS 003	S 013	Backup Diesel Generator (<600 HP)- Onan 175 DGFB	None
ES 006	GS 004	S 016	Emergency Diesel Generator (<600 HP)- Kohler 300 REOZV	None

Table 2. **Insignificant Activities or Emission Sources**

Number of Units	Description of Insignificant Activities or Emission Sources
1	Cleaver Brooks Boiler (3.35 MMBTU/hr)
1	Turbopower Model 1250 -N-40 0 - ATP (1.0 MMBTU/hr)
11	Patterson Kelley SNM200 (2.0 MMBTU/hr)
2	Patterson Kelley C- 2000H/ N2000 (2.0 MMBTU/hr)
4	Hydrotherm KN-20 (2.0 MMBTU/hr)
1	Aerco Innovation 1060 (1.1 MMBTU/hr)
1	Turbopower 1000-L-400ATP (0.8 MMBTU/hr)
1	AO Smith HW-399/420 (0.42 MMBTU/hr)
2	Raypack H 9- 23 4 2 (2.3 MMBTU/hr)
2	Lochinvar CFN 651PM (0.65 MMBTU/hr)
2	Camus PRNW - 250 0 - 40 0 A -TP (2.5 MMBTU/hr)
2	AO Smith BTH300A (0.3 MMBTU/hr)
1	AO Smith BTH199 (0.2 MMBTU/hr)
1	Munchkin 399 (0.4 MMBTU/hr)
1	Turbopower 250 0 L- 40 0 A- TP (2.0 MMBTU/hr)
1	Bradford White EF 100T250E3NA2 (0 .25 MMBTU/hr)
1	Bradford White TW47557683N (0.07 MMBTU/hr)
1	AO Smith BTH250A (0 .25 MMBTU/hr)

Description of Emission Units

Emission Unit ID: ES 001 - This emission unit ("EU") is a natural gas-fired combined cycle turbine with an unfired heat recovery steam generator ("HRSG"), rated at a maximum heat input of 70 million british thermal units per hour ("MMBTU/hr"), that produces electricity and steam for the facility. The turbine has a permit limit of 26.30 tpy and a permit limit of 6 pounds per hour ("lb/hr") for its NO_x emissions. Both these emission limits were established for the purpose of avoiding the applicability of major new source requirements and were included in the facility's initial title V permit. The turbine is using a Lean Pre-mix Low NO_x ("LPM") combustion which is a technology used to reduce NO_x emissions.

Emission Units ID: ES 002, and ES 003, and ES 004 -These EUs include four steam boilers. Three boilers, Equipment Id: BL 001, BL 003, and BL 004 are only natural gas-fired boilers, and one boiler, BL 002, is a natural gas and distillate No.2 fuel oil-fired boiler. The maximum design heat input capacity of the boilers ranges from 20.4 to 33.5 MMBTU/hr. The boilers produce steam and hot water for the facility. Two boilers, BL 001 and BL 002, are using Low NO_x Flue Gas Recirculation, which is a combustion technology used to reduce NO_x emissions.

Emission Unit ID: ES 005 - This EU includes three stationary non-emergency compression ignition ("CI") internal combustion engines ("ICE") diesel engines, one stationary CI ICE diesel emergency engine, and one stationary emergency spark ignition ("SI") ICE natural gas engine. All engines in this emission unit have a maximum engine power of greater than 600 horsepower ("HP").

Emission Unit ID: ES 006 – This EU includes three stationary CI ICE non-emergency diesel engines and one stationary CI ICE emergency diesel engine. All engines in this emission unit have a maximum engine power of less than 600 HP.

The non-emergency engines at the facility occasionally are used to produce electrical power for the facility, while the emergency engines are used in case of power curtailment.

3. Emissions Inventory

The PTE of all emission units (which are included in Table 1 of this SOB), combined, as presented in the facility's title V application, and taking into consideration all operating restrictions included in the permit, is as follows:

NO_x: 159.42 tpy
VOC: 14.60 tpy
CO: 88.08 tpy
SO_2: 88.38 tpy
PM_{10}: 21.40 tpy

The facility is an area source[2] of hazardous air pollutants ("HAPs").

4. Regulatory Analysis

40 CFR 60, Subpart GG "Standards of Performance for Gas Turbines" ("NSPS GG") - NSPS GG establishes requirements (emission standards, compliance, and other requirements) for stationary gas turbines, with a heat input at peak load equal to or greater than 10 MMBTU/hr, that commenced construction, modification or reconstruction after October 3, 1977. The gas turbine at the facility is subject to NSPS GG requirements. The applicable NSPS GG requirements are incorporated in the permit.

[2]40 CFR § 63.2 "Definitions": *Area source* means any stationary source of hazardous air pollutants that is not a major source as defined in this part.

40 CFR 60, Subpart Dc "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" ("NSPS Dc") - NSPS Dc establishes requirements (emission standards, compliance and other requirements) and applies to steam generating units that commenced construction, modification, or reconstruction after June 8, 1989 and that have a maximum design heat input capacity of 100 MMBTU/hr or less, but greater than or equal to 10 MMBTU/hr. The facility steam boilers are subject to NSPS Dc requirements as they have a maximum design heat input capacity between 20.4 and 33.5 MMBTU/hr and were constructed after June 9, 1989. The three natural gas-fired steam boilers are subject to very limited NSPS Dc requirements, while the dual-fuel boiler, which combusts natural gas and No.2 fuel oil, is subject to more NSPS Dc requirements. The NSPS Dc requirements that apply to the facility's boilers are included in the permit.

40 CFR 60 Subpart IIII "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" ("NSPS IIII") - NSPS IIII applies to owners and operators of stationary CI ICE that both commence construction after July 11, 2005, and were manufactured after April 1, 2006, as well as those engines modified or reconstructed after July 11, 2005. NSPS IIII establishes emission standards, fuel requirements, compliance methods and other requirements that vary depending upon each engine's function (emergency or non-emergency), power (in kilowatts ("kW") or HP, model year, and engine displacement (L/cyl). The emergency CI ICE diesel engine Equipment ID: GL 005 of EU: ES 005 and the emergency CI ICE diesel engine Equipment ID: GS 004 of EU: ES 006 are subject to the NSPS IIII requirements because they commenced construction after July 11, 2005, and were manufactured after April 1, 2006. The NSPS IIII requirements that apply to the above emergency engines at the facility are included in the permit.

40 CFR 60 Subpart JJJJ "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines" ("NSPS JJJJ") - NSPS JJJJ applies to owners and operators of stationary SI ICE that both commence construction after June 12, 2006 and were manufactured on or after specified manufacture trigger dates, which are based on maximum engine power (in HP), type of engine (i.e., lean burn, rich burn), and engine's function (emergency, non-emergency).[3] NSPS JJJJ establishes emission standards, compliance methods and other requirements for SI ICE engines. There is only one SI ICE at the facility, which is the emergency engine, natural gas-fired, identified as Equipment ID: GS 004 of EU: ES 006, and which is subject to NSPS JJJJ. The NSPS JJJJ requirements that apply to the above emergency engine are incorporated into the permit.

[3]40 CFR § 60.4230 (a)(4): Owners or operators of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured: (i) On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 HP (except lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP); (ii) on or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP; (iii) on or after July 1, 2008, for engines with a maximum engine power less than 500 HP; or (iv) on or after January 1, 2009, for emergency engines with a maximum engine power greater than 19 KW (25 HP).

40 CFR 63 Subpart ZZZZ "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines ("NESHAP ZZZZ") - NESHAP ZZZZ applies to new and existing stationary reciprocating internal combustion engines ("RICE")[4] that are located at a major or area source of HAP emissions. NESHAP ZZZZ establishes requirements (emission standards, fuel requirements, operating limitations, compliance requirements, and other requirements) based on whether an engine is a non-emergency or emergency engine, based on an engine's horsepower ("HP") rating,[5] and whether the engine is located at a major or area source of HAP emissions.

For purposes of NESHAP ZZZZ, a RICE located at an area source is "new" if its construction or reconstruction commenced on or after June 12, 2006, and is "existing" if its construction or reconstruction commenced before June 12, 2006. Turning Stone Resort and Casino is an area source of HAP emissions ("area source").

According to 40 CFR § 63.6590(c)(1), a new or reconstructed RICE located at an area source, such as the facility, meets the NESHAP ZZZZ requirements by meeting the requirements of NSPS IIII, for CI engines, or NSPS JJJJ, for SI engines. There are no additional NESHAP ZZZZ requirements that apply to those engines. Thus, the three emergency engines at the facility, Equipment ID: GL 005 of EU: ES 005, Equipment ID: GS 004 of EU: ES 006, which are CI engines, and Equipment ID: GL 006 of EU: ES 005, which is a SI engine, meet the requirements of NSPS IIII and NSPS JJJJ, and meet also the NESHAP ZZZZ requirements.

The other six engines at the facility, Equipment ID: GL 001, GL 003, GL 004 of EU: ES 005, and Equipment ID: GS 001, GS 002 and GS 003 of EU: ES 006 do not meet the new RICE definition in NESHAP ZZZZ and thus are existing RICE that are subject to the NESHAP ZZZZ requirements that apply to existing non-emergency CI RICE at area sources. The NESHAP ZZZZ requirements that apply to the six engines are included in the permit.

40 CFR 63, Subpart JJJJJJ "National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources" ("NESHAP JJJJJJ") - NESHAP JJJJJJ applies to industrial, commercial, and institutional boilers located at area sources, such as the facility. NESHAP JJJJJJ establishes requirements (emission standards, compliance requirements, operating limits, work practices standards, emission reduction measures, management practice, and other requirements) mainly based on whether a boiler is new or existing, type of fuel combusted, and heat input capacity (MMBtu/hr) of the boiler.

For purposes of NESHAP JJJJJJ, a boiler is "new" if its construction or reconstruction commenced after June 4, 2010, and is "existing" if its construction or reconstruction commenced on or before June 4, 2010. *See* § 63.11194(b). The three steam boilers at the facility which combust only natural gas are not subject to NESHAP JJJJJJ since they are "gas-fired" boilers. *See* § 63.11195(e) and § 63.11237.

[4]"Stationary reciprocating internal combustion engine (RICE)" means any reciprocating internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR § 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition. 40 CFR § 63.6675.
[5]NESHAP ZZZZ requirements also differ for non-compression ignition (non-CI) engines.

The steam boiler Equipment ID: BL 002 of EU: ES 003 with a heat input capacity of maximum 33.5 MMBTU/hr and which is permitted to combust natural gas or fuel oil (*See* Condition 3.C.2.a. of the permit[6]), is subject to NESHAP JJJJJJ that applies to existing boilers that combust fuel oil. *See* § 63.11200(c). *See* § 63.11195 (e), and also, § 63.11237. The NESHAP JJJJJJ requirements that apply to above-mentioned boiler at the facility are included in the permit.

40 CFR Part 71 "Federal Operating Permit Programs" - The permit includes several monitoring, recordkeeping and reporting requirements for each emission unit and associated equipment (or emissions sources) at the facility.

Other Federal Air Regulations Requirements

The following is a list of federal air regulations which have provisions that apply to the entire facility. Generic requirements from these regulations are incorporated into the permit:

- 40 CFR Part 68 "Chemical Accident Prevention Provisions" ("Part 68") - Part 68 outlines the Chemical Accident Prevention Provisions and it focuses on preventing and mitigating the risks of accidental chemical releases at facilities that could harm public health, safety, and the environment. It requires the facilities to identify and assess potential hazards, implement preventative measures, and plan for effective response in the event of a release.

- 40 CFR Part 82 "Protection of Stratospheric Ozone" ("Part 82") - Part 82 addresses management of ozone-depleting refrigerants and other substances.

- 40 CFR Part 61, Subpart M "National Emission Standard for Asbestos" ("Subpart M") - Subpart M establishes requirements for asbestos handling and disposal, which are aimed to prevent the release of asbestos fibers into the air and protect human health and the environment.

5. Other Requirements

Indian Nation Consultation - Executive Order 13175 commits federal agencies to engage in consultation with tribes when federal actions have tribal implications, as provided by the EPA Policy on Consultation and Coordination with Indian Tribes.[7] The facility, Turning Stone Resort and Casino, for which the EPA is proposing to issue a title V renewal operating permit, is located on Indian lands of ONEIDA Indian Nation, and it is owned by ONEIDA Indian Nation. The facility is also located within proximity of the Onondaga Indian Nation. The renewal permit does not authorize the construction of new emission units, or emission increases from existing units, nor does it otherwise authorize any physical modifications to the facility or its operations. EPA will provide a 30-day public comment review, and opportunity for public hearing if requested by any

[6]Condition 3.C.2. a. reads as follows "This unit shall fire natural gas or no. 2 distillate oil. The maximum heat input rate shall not exceed 33.5 MMBtu/hr. [40 C.F.R. § 71.6(a)(1)]."
[7]*See* EPA Policy on Consultation and Coordination with Indian Tribes, available at https://www.epa.gov/tribal/epa-policy-consultation-and-coordination-indian-tribes.

public participant, including the facility's owner and nearby Indian Nation. Thus, given the above-circumstances, EPA determined that no tribal consultation is justified or warranted for this permitting action.

6. Permitting, Construction and Compliance History

Turning Stone Resort and Casino was initially permitted on February 22, 2006 (Part 71 Title V Operating Permit No. ONEIDA 001) and currently operates under the Permit No. ONEIDA 003 (3rd renewal). The facility submitted a timely renewal application for the current permitting action, the 4th renewal, which was deemed complete on May 4, 2025.[8] The following is a listing of all facility's issued Part 71 permits.

Date of Issuance	Permit Number	Description of Permit Action
November 6, 2020	ONEIDA003	3rd Renewal permit
March 8, 2017	ONEIDA002	2nd Permit Modification
February 4, 2015	ONEIDA002	2nd Renewal permit and Modification
July 5, 2011	ONEIDA002	1st Renewal permit
February 22, 2006	ONEIDA001	Initial permit

7. Proposed Updates from the Current Permit to the Draft Permit

The following updates are being proposed by this Part 71 title V operating permit renewal action.

- Reformat the current permit "Source Identification and Unit Specific Information," "General Permit Requirements," and "Part 71 Administrative Requirements" sections using the EPA's new Part 71 permit template content. As a result, the permit sections' name and numbering system has changed from the current permit.

- Remove the 40 CFR § 71.6(g) "Emergency Provisions" term from the "General Permit Requirements" section of the current permit, since the current version of 40 CFR Part 71 "Federal Operating Permit Programs" no longer includes § 71.6(g).

- Update the "Insignificant activities (or emission sources)" listing.

- Edit several permit conditions to improve the clarity of those conditions.

- Include the requirements of NESHAP JJJJJJ that apply to one existing oil-fired boiler at the facility (Equipment ID: BL 002 of EU: ES 003), which were inadvertently omitted from the current permit.

[8] The application has gained the "complete" status by default as provided by 40 CFR § 71.5 (a)(2) and § 71.7 (a)(4).

- Update a limited number of the current permit conditions in the "Emission Units Specific Requirements" section to be consistent with certain requirements of the current NSPS IIII, NSPS JJJJ and NESHAP ZZZZ federal regulations.

    - The reference to 40 CFR § 80.510(b) as the federal regulation that establishes the requirements for nonroad diesel fuel was removed from the current permit and replaced in the draft permit with 40 CFR § 1090.305, which is referenced in the current NSPS IIII and NESHAP ZZZZ.
    - The references to 40 CFR §§ 89.112 and 113 were removed from the current permit since EPA has migrated all regulatory requirements related to nonroad compression-ignition engines from 40 CFR Part 89 to 40 CFR Part 1039, appendix I.[9] The draft permit references 40 CFR Part 1039.
    - The references to the use of CI ICE emergency engines for emergency demand response, citing to 40 CFR § 60.4211(f), were removed from the current permit conditions, since 40 CFR § 60.4211(f) no longer refers to emergency demand response.[10]
    - The references to 40 CFR § 60.4211(f)(2)(ii) and (iii) were removed from the current permit, since the current NSPS IIII no longer includes these two subsections.
    - The current permit conditions citing to 40 CFR § 60.4211(f)(3) were updated to be consistent with the current 40 CFR § 60.4211(f)(3)
    - The references to the use of SI ICE emergency engines for emergency demand response, citing to 40 CFR § 60.4243(d), were removed from the current permit conditions, since 40 CFR § 60.4243(d) no longer refers to the emergency demand response.
    - The references to 40 CFR §§ 60.4243(d)(2)(ii) and (iii) were removed from the current permit, since the current NSPS JJJJ no longer includes these two subsections.
    - The current permit conditions citing to 40 CFR § 60.4243(d)(3) were updated to be consistent with the current 40 CFR §§ 60.4243(d)(3) and (d)(3)(i).

- Update the "units" for the NO_x, CO and VOC NSPS JJJJ emission standards for the emergency engine Equipment ID GL 006 of EU: ES 005, from gram/kilowatt-hour ("g/kW-hr') to gram per horsepower-hour ("g/HP-hr"). And, also, update, the CO emission standard for the same engine to read 4 g/HP-hr instead of 1 g/kW-hr. Both, the use of g/kW-hr and 1 g/kW-hr instead of 4 g/HP-hr in the current permit, were typographical errors.

[9] *See* https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-89, for more details.
[10] *See* 87 FR 48603, August 10, 2022 ("National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines; New Source Performance Standards for Internal Combustion Engines; Court Vacatur") at https://www.govinfo.gov/content/pkg/FR-2022-08-10/pdf/2022-17060.pdf.

8. Public Participation

As required in 40 CFR § 71.11(a)(5), the EPA will provide a public announcement and offer the public the opportunity to comment on the draft permit conditions during a 30-day public comment period. A copy of the draft permit, this Statement of Basis, draft permit application, and a copy of the Public Notice are available on the EPA website at https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-2#pend71. All persons, including the applicant, who have comments on any condition in this draft title V renewal operating permit must raise all issues and submit all available arguments and all supporting materials for their arguments in full by the close of the public comment period. The commence and closure dates of the public comment period will be available in the public announcement on the EPA website at https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-2#pend71. See the Public Notice for details related to submitting public comments. A public hearing will be held if EPA finds, on the basis of requests, a significant degree of public interest in this draft permit. See the Public Notice for details related to requesting a public hearing. Following the close of the public comment period, and after the public hearing, if one is held, the EPA will prepare a response to all substantive comments and make the responses available to the public on the EPA's website at https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-2#part71permits. EPA will consider all written and oral comments (from the public hearing, if one is held) before issuing a final permit decision.