



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 2-6007-00140/00011
Mod 0 Effective Date: 08/30/2002 Expiration Date: 08/29/2007
Mod 1 Effective Date: 09/01/2005 Expiration Date: 08/29/2007

Permit Issued To: NEW YORK ORGANIC FERTILIZER CO
1108 OAK POINT AVE
BRONX, NY 10474

SYNAGRO TECHNOLOGIES INC
1800 BERING DRIVE SUITE 1000
HOUSTON, TX 77057

Contact: ALEXIS D VITONE
NEW YORK ORGANIC FERTILIZER CO
1108 OAK POINT AVE
BRONX, NY 10474
(718) 991-7417

Facility: NYOFCO SLUDGE PELLETIZATION FACILITY
1108 OAK POINT AVE
BRONX, NY 10474

Description:

PERMIT DESCRIPTION
NYOFCO Sludge Pelletization Facility
DEC ID # 2-6007-00140/00011 (Mod 1)

The NYOFCO facility takes in digested sewage treatment plant sludge, from various New York City Department of Environmental Protection-operated sewage treatment plants. The sludge is dried and pelletized to produce commercial fertilizer. The facility consists of 6 sludge drying trains and pelletization processes, with heat provided to the dryers by 25 million BTU/hr heaters. Emissions are controlled by 6 cyclones, 6 wet scrubbers, and 6 regenerative thermal oxidizers. Dust from product storage (in 8 silos) and conveying the product to trucks or rail cars, is controlled using a baghouse and other dust suppression systems, such as oil spraying.

NYOFCO consists of 6 sludge drying trains and pelletizing processes. All trains are identical. The drying and pelletizing process is more fully described in the original NYOFCO construction permit application on file with the Department. There has been no material change in the facility processes. Each drying train is equipped with a cyclone, wet scrubber and regenerative thermal oxidizer (RTO) for air pollution

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control. These control devices are also described conceptually in the original construction application.

The NYOFCO facility accepts de-watered sewage sludge from New York City and surrounding area de-watering facilities and processes the sludge using a drying process. The processed sludge is converted into a pellet and used beneficially as fertilizer. A basic process block flow drawing is shown in figure 3-1 (taken from Appendix B of the NYOFCO air permit to construct). The NYOFCO facility has the capacity to receive a maximum of 1,250 wet tons of sludge with a 24% solids content-300 dtpd (135 dtpd annual average)-seven days a week, 52 weeks per year. Sludge is delivered to NYOFCO by truck and discharged from the trucks in an indoor tipping area to one of three sludge storage hoppers, each with a capacity of 150 cubic yards. The sludge cake is then transferred by one of two belt conveyors to the wet cake bin at the beginning of the pelletizing process. From the cake bins the sludge is transferred by screw conveyors mixed with previously processed (recycled) sludge and discharged into the completely enclosed drying/pelletizing process. Six separate completely identical and independent process trains are used at NYOFCO. Each dryer train is designed to process 50 dry tons per day (dtpd) of sludge. The drying process begins at the pin mixer. Sludge received from the cake bins is mixed thoroughly with recycled process material to raise the solids content to approximately seventy percent. The blended material from the pin mixer is then re-transferred by gravity to the dryer drum where it moves in a stream of hot air at an initial temperature range of 800-900 degrees Fahrenheit through a triple pass drum dryer which consists of three concentric horizontal cylinders. The 11 foot diameter dryer drum rotates at approximately 10 revolutions per minute. The air stream is heated in a separate combustion chamber located upstream of the dryer inlet. This combustion unit is fueled primarily with natural gas with kerosene as a back-up and stand-by fuel. At the maximum facility design sludge processing rate, each of the six dryer burners uses 22,111 cubic feet of natural gas per hour. The hot air stream and rotational motion of the dryer transport the sludge through the dryer. Sludge particles first pass through the inner cylinder then reverse direction, travel through the middle passage, and then reverse direction again and travel through the outside passage. At the end of the third traverse, the pellets and air discharge to the separator can. Sludge/pellet retention time in the dryer is approximately 30 minutes to one hour depending on process rates. At the separator can, the velocity of the air stream is slowed to allow the pellets to drop to the bottom of the separator and are conveyed to the screening device where they pass through the stainless steel mesh screens. Oversized particles are sent to the crusher which contains two steel rolls with a narrow opening between them. This crushed material, as well as the undersized fraction coming off the screening device, is conveyed to the recycle bin. This material eventually is conveyed to the pin mixer to again start the process. Product size material (2-3 mm in diameter) is screened out and diverted to the pneumatic system for conveyance to the product storage separator can to the wet venturi scrubbers. These high-efficiency venturi scrubbers remove essentially all particulate matter from the air stream before a fan directs the air stream to the regenerative thermal oxidizer for volatile organic compound (VOC) destruction. This air is preheated between the wet scrubber and the RTO for additional odor control. The RTO consists of multiple chambers which operate in alternating inlet and outlet modes. Process air enters the RTO through one or more chambers operating in the inlet mode. Inside the chamber, the temperature of the air stream is increased as it passes through a ceramic matrix bed. Upon exiting, the air stream enters a high temperature combustion chamber where pollutants are oxidized into water vapor and carbon dioxide. Each of the six RTOs uses 3,973 cubic feet of natural gas per hour. After oxidation in the combustion chamber, the air stream exits the RTO by passing through a second ceramic bed in a chamber operating in the outlet mode. The second ceramic bed absorbs the heat energy of the cleaned air and reduces the temperature of the exhaust air to approximately the intake air. Clean exhaust air is then released to the process air stack.



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Destruction of virtually odorous and volatile compounds is achieved in accordance with emission limits set out in NYOFCO's current permit to operate. Further, because make-up air for the dryers come within the pelletizing and processing building and adjacent tipping areas, odors from sludge storage and transfer are routed through the air pollution control system. Pellets of the proper size (2-3 mm) are conveyed pneumatically to the eight product storage silos where they are loaded by screw conveyors into the trucks or rail cars. Dust created by the pneumatic conveying drying silo loading is contained in a bag-house. Prior to loading the rail and truck hoppers, pellets are sprayed with an oil to prevent dusting at this site as well as at the end user site. A berm surrounds the pellet storage area to minimize migration of pellets in the event of a spill. The catch-basin that drains the pellet storage area is equipped with a gate valve that will be closed in the event that a pellet spill and rainfall event occur simultaneously. This measure is to minimize the potential for storm-water contamination prior to discharge to the East River. The eight product storage silos have a combined storage capacity of approximately 5,000 tons of pellets. At average sludge production rates of 135 dtpd, this equals approximately 37 days of storage capacity. Table 8-1 of August 30, 1991 air construction permit application describes the above emission sources and control design for NYOFCO. In this application they are addressed as follows:

1. Emissions from sludge drying are identified in the emission unit section of the application.
2. Emissions from the combustion of natural gas and fuel oil are also identified in the emission unit section of the application.
3. Pellet storage and handling is an exempt emission source identified in this application.
4. Sludge and pellet transport is also an exempt emission source identified in this application.

Draft/Proposed Permit:

The project for this facility is a permit modification (Mod 1) to the Title V permit that was issued to New York Organic Fertilizer Company's Sludge Pelletization Facility (NYOFCO) on 8/30/2002. This permit modification is the result of an EPA order responding to NYPIRG's Petition Number II-2002-12 for objection to the issuance of the Title V permit for NYOFCO's Sludge Pelletization Facility. EPA has denied in part and has granted in part the petition of NYPIRG requesting objection to the issuance of the NYOFCO Title V permit.

This permit modification involves the following changes:

1. Relating to Condition # 31, adding the opacity requirements of 6 NYCRR § 212.6 for visible emissions to the emission units at the facility (including the sludge drying trains and pelletization processes).
2. Relating to Condition # 51, adding the particulate matter emission requirements of 6 NYCRR § 212.4(b) to the six sludge dryers trains emission unit at the facility.
3. Correcting the citation for Condition 34 from 6 NYCRR § 212.10 to 6 NYCRR § 212.11.
4. Correcting the citation for Condition # 37 from 6 NYCRR § 225-1.2(a)(2) to 6 NYCRR § 225.1(a)(3), to reflect the federally-enforceable SIP regulation for the allowable sulfur content in the fuel oil for the

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New York City area.

5. Revising Condition # 39 for 40 CFR 61-E.50 to an "Intermittent Emission Testing" condition. Also, clarifying the monitoring description for the requirements of the NESHAP regulation to reflect the limits emissions of mercury. Also, requiring NYOFCo to periodically monitor the mercury emissions through a "one stack test per permit term" in order to assure compliance with the mercury emission limitation.

Re-Proposed/Final Permit:

In the draft/proposed Title V (Mod 1) that was sent to EPA on 2/17/2005, there were two conditions, Condition # 1-18 & Condition # 1-20, for annual emission rate limit of 5.45 tons/yr and the hourly emission rate limit of 1.244 lbs/hr for Particulates, respectively. In this re-proposed/final Title V modification for NYOFCo, two new conditions (Conditions # 1-22 & 1-23) for Particulates will replace Conditions # 1-18 & 1-20 (which were in the applicable state requirement part of the permit). Conditions # 1-18 & 1-20 were removed because there is no legal basis in the regulations to support such an annual and hourly Particulate emission limit. But there is legal basis to support adding the two replacing conditions, Conditions # 1-22 & 1-23 to the federally applicable requirement part of the permit. They are as follows:

I. Condition # 1-22 for 6 NYCRR 212.4(a), is for conducting a stack test once every three years to demonstrate compliance with the Particulate concentration emission limit of 0.008 grains per dry standard cubic foot (Corrected to 1% CO₂) from each of the six stacks. This Particulate limit is from the federally applicable requirement and was listed in the State construction and operating permits of the early 1990s. This Particulate emission limit was also listed in the old Air-100 permits, and was left out in the original Title V permit (Mod 0). This Particulate limit also better complies with the requirements delineated in EPA's Order, and finally there were no adverse public comments on this issue.

II. Condition # 1-23 is for 6 NYCRR 212.9(b), requiring NYOFCo to comply with BACT (Best Available Control Technology) or 99 % control or greater. Based on particulates emission rates from the 9/1993 stack testing, BACT or 99 % degree of control (contaminant capture) or greater. The degree of 99% of air cleaning required has been achieved by NYOFCo through control equipments such as cyclones and scrubbers, which are connected to each of the six dryer trains. The Department has determined that NYOFCo has been achieving more than 99% control.

According to EPA, this re-proposal is considered to be a minor modification, and therefore re-noticing it in the ENB is not required. Once the two re-proposed conditions that are described above in (I) & (II) get added to the proposed permit, the re-proposed permit then is re-submitted to EPA for a new 45-day review.

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

Permit Administrator: JOHN F CRYAN

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DIVISION OF ENVIRONMENTAL PERMITS
ONE HUNTERS POINT PLAZA, 47-40 21ST STREET
LONG ISLAND CITY, NY 11101-5407

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal-REGION 2
HEADQUARTERS

DEC SPECIAL CONDITIONS

COMPILE AND ASSESS AVAILABLE SCIENTIFIC DATA.



DEC GENERAL CONDITIONS

****** General Provisions ******

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 1-1: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3:



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

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Expired by Mod No: 1

Item 3.1:

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

Item 3.2:

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

Condition 1-2: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 1-2.1:

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

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

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Expired by Mod No: 1

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have

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materially changed since the permit was issued.

****** Facility Level ******

Condition 5: Submission of Applications for Permit Modification or Renewal-REGION 2 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 2 Headquarters
Division of Environmental Permits
1 Hunters Point Plaza, 4740 21st Street
Long Island City, NY 11101-5407
(718) 482-4997



DEC SPECIAL CONDITIONS

Condition 6: COMPILE AND ASSESS AVAILABLE SCIENTIFIC DATA.
Applicable State Requirement: 6NYCRR 617.7

Item 6.1: NYOFCO IS REQUIRED TO COMPILE AND ASSESS ALL AVAILABLE SCIENTIFIC DATA RELEVANT TO ANALYZING THE POTENTIAL FOR RELEASES TO THE AMBIENT ENVIRONMENT OF PATHOGENS, BACTERIA AND SPORES FROM BIOSOLIDS AT THE NYOFCO FACILITY, AND COMPARE THAT DATA TO THE SAME CATEGORIES OF DATA AT ALL OTHER SIMILAR SLUDGE HANDLING FACILITIES IN THE UNITED STATES. THIS COMPILATION AND ASSESSMENT SHALL BE SUBMITTED TO NYSDEC NO LATER THAN DECEMBER 31, 2002. ON THE BASIS OF THAT REPORT THE STATE WILL DETERMINE WHAT IF ANY, ADDITIONAL TESTS, STUDIES OR MEASURES MAY BE REQUIRED.



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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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1108 OAK POINT AVE
BRONX, NY 10474

SYNAGRO TECHNOLOGIES INC
1800 BERING DRIVE SUITE 1000
HOUSTON, TX 77057

Facility: NYOFCO SLUDGE PELLETIZATION FACILITY
1108 OAK POINT AVE
BRONX, NY 10474

Authorized Activity By Standard Industrial Classification Code:
4952 - SEWERAGE SYSTEMS
5191 - FARM SUPPLIES

Mod 0 Permit Effective Date: 08/30/2002

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Mod 1 Permit Effective Date: 09/01/2005

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LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-9 6NYCRR 201-1.1(a): Compliance Certification
- 24 6NYCRR 201-6: Emission Unit Definition
- 1-4 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 1-1 6NYCRR 201-6.5(a)(7): Fees
- 1-5 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 1-2 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 1-3 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 25 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 1-6 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 26 6NYCRR 201-6.5(e): Compliance Certification
- 1-7 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 29 6NYCRR 202-2.1: Compliance Certification
- 30 6NYCRR 202-2.5: Recordkeeping requirements
- 1-10 6NYCRR 212.6(a): Compliance Certification
- 1-11 6NYCRR 212.10: Compliance Certification
- 1-12 6NYCRR 212.10: Compliance Certification
- 1-13 6NYCRR 212.10: Compliance Certification
- 1-14 6NYCRR 212.10: Compliance Certification
- 35 6NYCRR 212.10(a)(1): Applicability of Reasonably Available Control Technology
- 1-15 6NYCRR 212.11: Compliance Certification
- 1-16 6NYCRR 225-1.8: Compliance Certification
- 1-17 6NYCRR 225.1(a)(3): Compliance Certification
- 1-18 6NYCRR 225.1(a)(3): Compliance Certification
- 1-19 6NYCRR 225.1(a)(3): Compliance Certification
- 1-20 6NYCRR 225.1(a)(3): Compliance Certification
- 1-21 6NYCRR 225.1(a)(3): Compliance Certification
- 38 6NYCRR 617.7: Compliance Demonstration
- 1-8 40CFR 68: Accidental release provisions.

Emission Unit Level

- 41 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 42 6NYCRR 201-6: Process Definition By Emission Unit

EU=U-00001,EP=00001,Proc=001

- 1-22 6NYCRR 212.4(a): Compliance Certification
- 1-23 6NYCRR 212.9(b): Compliance Certification
- 1-24 6NYCRR 227-1.3(a): Compliance Certification
- 1-25 40CFR 61.50, NESHAP Subpart E: Compliance Certification
- 1-26 40CFR 61.53(d), NESHAP Subpart E: Compliance Certification



STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 1-27 ECL 19-0301: Contaminant List
- 43 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 47 6NYCRR 211.2: Air pollution prohibited
- 48 6NYCRR 211.2: Compliance Demonstration
- 49 6NYCRR 211.2: Compliance Demonstration
- 50 6NYCRR 211.2: Compliance Demonstration
- 1-28 6NYCRR 231-1.2(a)(4): Compliance Demonstration
- 1-29 6NYCRR 231-1.2(a)(4): Compliance Demonstration

Emission Unit Level

EU=U-00001

- 1-30 6NYCRR 211.2: Compliance Demonstration
- 1-31 6NYCRR 211.2: Compliance Demonstration

EU=U-00001,EP=00001,Proc=001

- 1-32 6NYCRR 212.4(b): Compliance Demonstration
- 1-33 6NYCRR 212.4(b): Compliance Demonstration



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

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Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6NYCRR Part 201-1.2

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the



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Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item H: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item I: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 201-3.2(a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject



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to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit

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renewal application.

Item N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Item P: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(a)(5)

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

Item Q: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

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

Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

Upon presentation of credentials and other documents, as

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may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Item T: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive



or corrective measures adopted.

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

Item W: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or



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contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item X: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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

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

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

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

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

Proceedings to reopen and issue Title V facility permits



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shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item Y: Required Emission Tests - 6 NYCRR Part 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Item AA: Open Fires - 6 NYCRR Part 215

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Item BB: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to



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the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item CC: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

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

Condition 1-9: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 201-1.1(a)

Item 1-9.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

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

Item 1-9.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Whenever NYOFCO applies for any process change with the NYSDEC's Division of Solid Waste, NYOFCO is required to apply for the same process change with NYSDEC's Division of Air Resources.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

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DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 24: Emission Unit Definition

Effective between the dates of 08/30/2002 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 201-6

Item 24.1(From Mod 1):

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

Emission Unit: U-00001

Emission Unit Description:

Six identical sludge drying trains. The flue gas from each train is conveyed through six separate, but, identical air pollution control trains, each with its own individual vent. The 6 individual vents are housed in a single stack. Note that all unit specified as Federal and as State emissions standards, as specified, either through the current permit to operate or by code are applicable to each train and Emission Unit (including the monitoring requirements). The emission unit specific application requirements for Emission Units 1-6 are the same. In addition the description of the unit operations for each of the 6 trains are identical. The six trains are identified in this application as 6 Emission Sources. Train number 1 is the same as Emission Source 0001A, train number 2 is the same as Emission Source 0001B, train number 3 is the same as Emission Source 0001C, train number 4 is the same as Emission Source 0001D, train number 5 is the same as Emission S0001E, and train number 6 is the same as Emission Source S0001F. The drying process is accomplished with natural gas with air pollution control serving the dryer trains. The Emission Sources and air pollution control devices are as follows for each dryer train:

1. Each dryer train is equipped with a dryer (natural gas fired), the maximum gas firing rate is 22,111 cubic feet/hr of gas, pollutants from the dryer consist of the products of combustion.

2. The sludge drying process results in carry over to the flue gas of trace pollutants present in the sludge itself.

3. A cyclone then follows for particulate control,

4. A wet scrubber then follows for additional particulate

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control,

5. A regenerative thermal oxidizer (RTO) then follows for VOC control.

Building(s): 001

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 1-4: Standard Requirement - Provide Information
Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 1-4.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1-1: Fees
Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 1-1.1:

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The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 1-5: General Condition - Right to Inspect

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 1-5.1:

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

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1-2: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 09/01/2005 and 08/29/2007

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Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 1-2.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 1-3: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 1-3.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 25: Compliance Certification

Effective between the dates of 08/30/2002 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Item 25.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting

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requirement shall apply.

If any of the above conditions are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) through (4) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraph (1) through (4) of this section must also be identified in the 6 month monitoring report required above.

If the permittee seeks to have a violation excused as provided in 201-1.4, the permittee shall report such violations as required under 201-1.4(b). However, in no case may reports of any deviation be on a less frequent basis than those described in paragraphs (1) through (4) above. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

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All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 1-6: Standard Requirements - Progress Reports
Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 1-6.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

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The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 26: Compliance Certification
Effective between the dates of 08/30/2002 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Compliance certifications shall contain the following information:

- the identification of each term or condition of the permit that is the basis of the certification;
- the compliance status;
- whether compliance was continuous or intermittent;
- the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
- such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
- and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air

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pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Hunters Point Plaza
47-40 21st Street
Long Island City, NY 11101-5407

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring
and Enforcement
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2003.

Subsequent reports are due on the same day each year

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 1-7: Off Permit Changes

Effective between the dates of 09/01/2005 and 08/29/2007

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Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 1-7.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits

and are subject to annual compliance certification requirements at all times.

Condition 29: Compliance Certification

Effective between the dates of 08/30/2002 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

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Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 30: Recordkeeping requirements
Effective between the dates of 08/30/2002 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 30.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

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

Condition 1-10: Compliance Certification
Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 1-10.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-10.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the



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performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this may be zero percent opacity for many or all emission sources), the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify The Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Method 9
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 1-11: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 212.10



New York State Department of Environmental Conservation

Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140

Item 1-11.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001

Regulated Contaminant(s):

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

Item 1-11.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The nitrogen oxide (NO_x) emissions are limited by the permit to no more than 19.2 pounds/hr for the entire facility. Also the annual emissions may not exceed 75.05 tons per year for the entire facility. The previous restrictions also satisfy the NO_x-RACT requirements of Part 212.10.

The owner must conduct annual tune-ups of all combustion equipment in the pelletization process. Records of the tune-ups must be kept on the facility's premises for 5 years.

As per Condition # 1-32, NYOFCO must stack test all six drying trains for NO_x by January 28, 2006. The stack test must be conducted as outlined in permit Condition # 1-32 (old Condition # 51).

NYOFCO must stack test all six drying trains for NO_x by January 28, 2006. Stack testing of all six drying trains stacks should be performed three years after the completion of the previous tests, which was achieved on January 28, 2003. Therefore, the next required stack test must be conducted by January 28, 2006. NYOFCO is to demonstrate compliance with the NO_x emission limit of 19.2 pounds per hour through stack testing.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 19.2 pounds per hour

Reference Test Method: METHOD 7

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

New York State Department of Environmental Conservation

Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140



Condition 1-12: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 212.10

Item 1-12.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

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

Item 1-12.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The nitrogen oxide (NO_x) emissions are limited by the permit to no more than 19.2 pounds/hr for the entire facility. Also the annual emissions may not exceed 75.05 tons per year for the entire facility. The previous restrictions also satisfy the NO_x-RACT requirements of Part 212.10.

The owner must conduct annual tune-ups of all combustion equipment in the pelletization process. Records of the tune-ups must be kept on the facility's premises for 5 years.

As per Condition # 1-32, NYOFCO must stack test all six drying trains by January 28, 2006. The stack test must be conducted as outlined in permit Condition # 1-32 (old Condition # 51).

NYOFCO is to demonstrate compliance with the NO_x emission limit of 19.2 pounds per hour through stack testing. NYOFCO must stack test all six drying trains for NO_x by January 28, 2006. Stack testing of all six drying trains stacks should be performed three years after the completion of the previous tests, which was achieved on January 28, 2003. Therefore, the next required stack test must be conducted by January 28, 2006.

NYOFCO must stack test the emission rate of NO_x, and compute on a monthly basis, the 12-month rolling average for the total calendar year for NO_x. The annual maximum



New York State Department of Environmental Conservation

Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140

NOx limit is 75.05 tons per 12-month (rolled monthly).

The owner shall submit to NYSDEC semi-annual (calendar) reports with the amounts and rolling averages of the NOx emissions and hours of operation.

Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 75.05 tons per year
Reference Test Method: METHOD 7
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2006.
Subsequent reports are due every 6 calendar month(s).

Condition 1-13: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 212.10

Item 1-13.1:

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

Emission Unit: U-00001

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 1-13.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The total volatile organic compounds (VOC) emissions are limited by the permit to no more than 9.57 pounds/hr for the entire facility. Also the annual emissions may not exceed 50 tons per year for the entire facility. The previous restrictions also satisfy the VOC-RACT requirements of part 212.10. The control equipment installed on the process air exhaust from the six drying trains must reduce the VOC emissions by 81 percent or greater.

The owner must verify the 81% minimum overall reduction

New York State Department of Environmental Conservation

Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140



efficiency for VOC emissions by stack testing all six drying trains for VOC emissions by January 28, 2006.

As per Condition # 1-32, NYOFCO must stack test all six drying trains by January 28, 2006. The stack test must be conducted as outlined in permit Condition # 1-32 (old Condition # 51).

NYOFCO must stack test all six drying trains for VOC by January 28, 2006. Stack testing of all six stacks should be performed three years after the completion of the previous tests, which was achieved on January 28, 2003. Therefore, the next required stack test must be conducted by January 28, 2006. NYOFCO is to demonstrate compliance with the 81 % minimum overall reduction efficiency for VOC emission through stack testing.

This condition is the Intermittent Emission Testing for the RTO's destruction efficiency and the Overall destruction efficiency for each of the six RTOs associated with all six drying trains at NYOFCo. This condition was contained in Condition 1-32 (former Condition 51). As was discussed and explained in the 11/4/2004 meeting between NYOFCo's representative and DEC staff, the facility is required to determine the capture efficiency using 40 CFR 51, Appendix M, Method 204 for "Permanent Total Enclosure", in addition to determining the RTO's destruction efficiency for each of the six RTOs.

The RTO's destruction efficiency is measured by EPA's Method 25A, by measuring the overall reduction in volatile organic compound emissions, by measuring the amount of VOC entering the RTO, and the amount of VOC exiting the RTO. Therefore;

The RTO's destruction efficiency = $(\text{VOC entering RTO} - \text{RTO exiting RTO}) / \text{VOC entering RTO} \times 100 \%$

The Overall Destruction Efficiency = RTO's destruction efficiency x capture efficiency (using Method 204 = 81 % (minimum))

NYOFCO is required to demonstrate compliance with the 81 % minimum overall reduction efficiency for VOC emission for each of the six drying trains through stack testing. In



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previous stack tests, NYOFCo has demonstrated the RTO's destruction efficiency to be about 97.7 %.

Parameter Monitored: VOC

Lower Permit Limit: 81 percent reduction by weight

Reference Test Method: App A, M 18 & 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-14: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 212.10

Item 1-14.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-14.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The total volatile organic compounds (VOC) emissions are limited by the permit to no more than 9.57 pounds/hr for the entire facility. Also the annual emissions may not exceed 50 tons per year for the entire facility. The previous restrictions also satisfy the VOC-RACT requirements of Part 212.10. The control equipment installed on the process air exhaust from the six drying trains must reduce the VOC emissions by 81 percent or greater. The owner must verify the 81% overall reduction efficiency for VOC emissions by stack testing all six drying trains for VOC emissions by January 28, 2006.

The Overall Destruction Efficiency = RTO's destruction efficiency x capture efficiency (using Method 204 = 81 % (minimum)

As per Condition # 1-32, NYOFCo must stack test all six



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Facility DEC ID: 2600700140

drying trains by January 28, 2006. The stack test must be conducted as outlined in permit Condition # 1-32 (old Condition # 51).

NYOFCO must stack test all six drying trains for VOC by January 28, 2006. Stack testing of all six stacks should be performed three years after the completion of the previous tests, which was achieved on January 28, 2003. Therefore, the next required stack test must be conducted by January 28, 2006. NYOFCO is to demonstrate compliance with the VOC emission limit of 9.57 pounds per hour through stack testing.

NYOFCO must stack test the emission rate of VOC, and compute on a monthly basis, the 12-month rolling average for the total calendar year for VOC. The annual maximum VOC limit is 50 tons per 12-month (rolled monthly) for the entire facility.

The owner shall submit to NYSDEC semi-annual (calendar) reports with the amounts and rolling averages of the VOC emissions and hours of operation.

Manufacturer Name/Model Number: CEMS
Parameter Monitored: VOC
Upper Permit Limit: 50 tons per year
Reference Test Method: App A, M 18 & 25A
Monitoring Frequency: DAILY
Averaging Method: ANNUAL MAXIMUM ROLLED DAILY
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 60 days after the reporting period.
The initial report is due 11/29/2005.
Subsequent reports are due every 3 calendar month(s).

**Condition 35: Applicability of Reasonably Available Control Technology
Effective between the dates of 08/30/2002 and 08/29/2007**

Applicable Federal Requirement: 6NYCRR 212.10(a)(1)

Item 35.1:

Owners and/or operators of facilities located in the lower Orange County or the New York City metropolitan areas with an annual potential to emit 25 tons or more of nitrogen oxides or 25 tons or more of Volatile Organic Compounds must comply with the requirements of 6NYCRR 212.10- Reasonably Available Control Technology for Major Facilities.

**Condition 1-15: Compliance Certification
Effective between the dates of 09/01/2005 and 08/29/2007**

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Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140



Applicable Federal Requirement: 6NYCRR 212.11

Item 1-15.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-15.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The permittee shall continuously monitor opacity, volatile organic compounds, and carbon monoxide emissions: The permittee has throughout the life of the facility conducted maintenance and calibrations of the opacity, VOC and CO monitoring equipment. The owner's consultant performs quarterly calibrations and audits of the monitors. Specifically the consultant conducts RATA (Relative Accuracy Test Audits) and CGA (Cylinder Gas Audits). The facility has quarterly reports of the audits and the calibrations. From now on however, the permittee must submit these quarterly reports to DEC on a quarterly (calendar) basis.

Manufacturer Name/Model Number: BODENSEEWERK PERKIN ELMER GMBH

Parameter Monitored: VOC

Upper Permit Limit: 9.57 pounds per hour

Reference Test Method: 40 CFR 60

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2005.

Subsequent reports are due every 3 calendar month(s).

Condition 1-16: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 225-1.8



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Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140

Item 1-16.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-16.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facilities subject to Subpart 225-1 shall comply with the methods of sampling, analysis, and reporting requirements of 6 NYCRR 225-1.8.

An owner or operator of a facility which purchases and fires kerosene shall compile and retain records of the following information:

- a. fuel analyses (sulfur content, ash content, specific gravity and heating value) and data on the quantities of all kerosene received, burned;
- b. the names of all suppliers of all kerosene; and
- c. any results of stack sampling, stack monitoring and other procedures used to ensure compliance with the provisions of 6 NYCRR Part 225-1. Fuel analysis and kerosene usage can be substituted for stack sampling/monitoring to demonstrate compliance with the SO₂ requirements in the permit.

These records shall be retained for a minimum period of five years for facilities subject to Title V requirements. The records shall be made available for inspection by department staff during normal business hours. In addition, copies of such records shall be furnished to department staff upon request. All required sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the department.

Monitoring Frequency: PER DELIVERY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 1-17: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007



New York State Department of Environmental Conservation

Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140

Applicable Federal Requirement: 6NYCRR 225.1(a)(3)

Item 1-17.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-17.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The fuel used to heat the six drum dryers (Emission Sources 0001A, 0001B, 0001C, 0001D, 0001E & 0001F) and the six regenerative thermal oxidizers (Emission Sources 001A3, 001B3, 001C3, 001D3, 001E3, 001F3 & 001F3) is natural gas.

The back-up fuel is low sulfur kerosene with a sulfur content less than 0.04 percent by weight. The quantity of kerosene consumed by the equipment used at the facility shall not exceed 1,200 gallons per hour for all six dryers in aggregate. This hourly limit is from the permit to construct and certificate to operate issued by NYSDEC on May 11, 1992 and March 7, 1995, respectively.

Process Material: OTHER LIQUID FUELS

Parameter Monitored: KEROSENE

Upper Permit Limit: 1,200 gallons per hour

Monitoring Frequency: HOURLY

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT
ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 1-18: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 225.1(a)(3)

Item 1-18.1:

The Compliance Certification activity will be performed for the Facility.



New York State Department of Environmental Conservation

Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-18.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The fuel used to heat the six drum dryers (Emission Sources 0001A, 0001B, 0001C, 0001D, 0001E & 0001F) and the six regenerative thermal oxidizers (Emission Sources 001A3, 001B3, 001C3, 001D3, 001E3, 001F3 & 001F3) is natural gas.

The back-up fuel is low sulfur kerosene with a sulfur content less than 0.04 percent by weight. The quantity of kerosene consumed by the equipment used at the facility shall not exceed 508,133 gallons per year (any continuous 12-months) for all six dryers in aggregate. This annual limit is from the permit to construct and certificate to operate issued by NYSDEC on May 11, 1992 and March 7, 1995, respectively.

Process Material: OTHER LIQUID FUELS

Parameter Monitored: KEROSENE

Upper Permit Limit: 508,133 gallons per year

Monitoring Frequency: HOURLY

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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

Condition 1-19: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 225.1(a)(3)

Item 1-19.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-19.2:



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Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The fuel used to heat the six drum dryers (Emission Sources 0001A, 0001B, 0001C, 0001D, 0001E & 0001F) and the six regenerative thermal oxidizers (Emission Sources 001A3, 001B3, 001C3, 001D3, 001E3, 001F3 & 001F3) is natural gas.

The back-up fuel is low sulfur kerosene with a sulfur content less than 0.04 percent by weight. The quantity of kerosene consumed by the equipment used at the facility shall not exceed 25,406 gallons per any continuous 24-hour period for all six dryers in aggregate. This daily limit is from the permit to construct and certificate to operate issued by NYSDEC on May 11, 1992 and March 7, 1995, respectively.

Process Material: OTHER LIQUID FUELS

Parameter Monitored: KEROSENE

Upper Permit Limit: 25,406 gallons per day

Monitoring Frequency: HOURLY

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT
ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 1-20: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 225.1(a)(3)

Item 1-20.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-20.2:

Compliance Certification shall include the following monitoring:

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



New York State Department of Environmental Conservation

Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140

Monitoring Description:

The fuel used to heat the six drum dryers (Emission Sources 0001A, 0001B, 0001C, 0001D, 0001E & 0001F) and the six regenerative thermal oxidizers (Emission Sources 001A3, 001B3, 001C3, 001D3, 001E3, 001F3 & 001F3) is natural gas.

The back-up fuel is low sulfur kerosene with a sulfur content less than 0.04 percent by weight. This sulfur content limit is from the permit to construct and certificate to operate issued by NYSDEC on May 11, 1992 and March 7, 1995, respectively.

The records of kerosene analyses (sulfur content, ash content, specific gravity and heating value), quantity of kerosene burned or sold, and the name of all purchasers of kerosene sold, shall be retained for a minimum period of five years. The records shall be made available for inspection by department staff during normal business hours. In addition, copies of such records shall be furnished to department staff upon request. All required sampling, compositing and analysis of kerosene samples must be done in accordance with methods acceptable to the Department.

The SIP regulation of 6 NYCRR § 225.1(a)(3) is no longer a valid State rule, although it remains as part of the approved New York SIP. It can be further stated that the requirements of the SIP regulation are basically equivalent to the State-approved regulations at 6 NYCRR § 225-1.2(a)(2).

Process Material: OTHER LIQUID FUELS

Parameter Monitored: SULFUR

Upper Permit Limit: 0.04 percent by weight

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 1-21: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 225.1(a)(3)

New York State Department of Environmental Conservation

Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140



Item 1-21.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-21.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The fuel used to heat the six drum dryers (Emission Sources 0001A, 0001B, 0001C, 0001D, 0001E & 0001F) and the six regenerative thermal oxidizers (Emission Sources 001A3, 001B3, 001C3, 001D3, 001E3, 001F3 & 001F3) is natural gas.

NYOFCO is to compute on a monthly basis, the sulfur dioxide emission, through fuel sulfur content analysis and consumption. In addition, the annual total sulfur dioxide emission limit is to be calculated for the total calendar year based on 12-month rolling average (rolled monthly) for the entire facility. The sulfur dioxide facility-wide maximum emission limit is 8.05 tons for the total calendar year based on 12-month rolling average (rolled monthly) for the entire facility.

The owner shall submit to NYSDEC semi-annual (calendar) reports with the amounts and rolling averages of the sulfur dioxide emissions and hours of operation.

Process Material: OTHER LIQUID FUELS

Parameter Monitored: SULFUR DIOXIDE

Upper Permit Limit: 8.05 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 38: Compliance Demonstration

Effective between the dates of 08/30/2002 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 617.7

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Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140



Item 38.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 38.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

NYOFCO IS REQUIRED TO COMPILE AND ASSESS ALL AVAILABLE SCIENTIFIC DATA RELEVANT TO ANALYZING THE POTENTIAL FOR RELEASES TO THE AMBIENT ENVIRONMENT OF PATHOGENS, BACTERIA AND SPORES FROM BIOSOLIDS AT THE NYOFCO FACILITY, AND COMPARE THAT DATA TO THE SAME CATEGORIES OF DATA AT ALL OTHER SIMILAR SLUDGE HANDLING FACILITIES IN THE UNITED STATES. THIS COMPILATION AND ASSESSMENT SHALL BE SUBMITTED TO NYSDEC NO LATER THAN DECEMBER 31, 2002. ON THE BASIS OF THAT REPORT THE STATE WILL DETERMINE WHAT IF ANY, ADDITIONAL TESTS, STUDIES OR MEASURES MAY BE REQUIRED.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

**Condition 1-8: Accidental release provisions.
Effective between the dates of 09/01/2005 and 08/29/2007**

Applicable Federal Requirement: 40CFR 68



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Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140

Item 1-8.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

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

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

**Condition 41: Emission Point Definition By Emission Unit
Effective between the dates of 08/30/2002 and 08/29/2007**

Applicable Federal Requirement: 6NYCRR 201-6

Item 41.1(From Mod 1):

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

Emission Unit: U-00001

Emission Point: 00001

Height (ft.): 163 Diameter (in.): 42
NYTMN (km.): 4517.7 NYTME (km.): 593.4 Building: 001

**Condition 42: Process Definition By Emission Unit
Effective between the dates of 08/30/2002 and 08/29/2007**

New York State Department of Environmental Conservation

Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140



Applicable Federal Requirement: 6NYCRR 201-6

Item 42.1(From Mod 1):

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

Emission Unit: U-00001

Process: 001

Source Classification Code: 3-01-045-01

Process Description:

Process 001 is the drying process of 6 identical sludge dryer trains, with a nominal combined capacity of 300 tons per day. Each of these 6 dryer trains has a nominal capacity of 50 tons of sludge per day.

Emission Source/Control: 001AA - Combustion

Design Capacity: 25 million Btu per hour

Emission Source/Control: 001BB - Combustion

Design Capacity: 25 million Btu per hour

Emission Source/Control: 001CC - Combustion

Design Capacity: 25 million Btu per hour

Emission Source/Control: 001DD - Combustion

Design Capacity: 25 million Btu per hour

Emission Source/Control: 001EE - Combustion

Design Capacity: 25 million Btu per hour

Emission Source/Control: 001FF - Combustion

Design Capacity: 25 million Btu per hour

Emission Source/Control: 001A1 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: 001A2 - Control

Control Type: WET SCRUBBER, VENTURI SCRUBBER

Emission Source/Control: 001A3 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: 001B1 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: 001B2 - Control

Control Type: WET SCRUBBER, VENTURI SCRUBBER



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Emission Source/Control: 001B3 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 001C1 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 001C2 - Control
Control Type: WET SCRUBBER, VENTURI SCRUBBER

Emission Source/Control: 001C3 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 001D1 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 001D2 - Control
Control Type: WET SCRUBBER, VENTURI SCRUBBER

Emission Source/Control: 001D3 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 001E1 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 001E2 - Control
Control Type: WET SCRUBBER, VENTURI SCRUBBER

Emission Source/Control: 001E3 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 001F1 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 001F2 - Control
Control Type: WET SCRUBBER, VENTURI SCRUBBER

Emission Source/Control: 001F3 - Control
Control Type: THERMAL OXIDATION

Emission Source/Control: 0001A - Process
Design Capacity: 50 tons per day

Emission Source/Control: 0001B - Process
Design Capacity: 50 tons per day

Emission Source/Control: 0001C - Process
Design Capacity: 50 tons per day

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Emission Source/Control: 0001D - Process
Design Capacity: 50 tons per day

Emission Source/Control: 0001E - Process
Design Capacity: 50 tons per day

Emission Source/Control: 0001F - Process
Design Capacity: 50 tons per day

Emission Source/Control: 0PITA - Process
Design Capacity: 150 cubic feet

Emission Source/Control: 0PITB - Process
Design Capacity: 150 cubic feet

Emission Source/Control: 0PITC - Process
Design Capacity: 150 cubic feet

Condition 1-22: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 1-22.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 001

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

Item 1-22.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emission from each flue of the six dryer trains shall not exceed a concentration of 0.008 grains per dry standard cubic foot of undiluted exhaust gas corrected to 1% CO₂ (Table 2 - Part 212.9(b)).

The Particulate emission concentration limitation shall be verified through stack test that will be conducted every three years. As per Condition # 1-32, NYOFCO must stack test all six drying trains by January 28, 2006. The stack

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test must be conducted as outlined in permit Condition # 1-32 (old Condition # 51).

NYOFCO must stack test all six drying trains for Particulate emissions by January 28, 2006. Stack testing of all six stacks should be performed three years after the completion of the previous test, which was achieved on January 28, 2003. Therefore, the next required stack test must be conducted by January 28, 2006. NYOFCO is to demonstrate compliance with the Particulate emission limit of 0.008 grains per dry standard cubic foot of undiluted exhaust gas (on a dry basis and corrected to 1% CO₂) for each of the six dryer trains stacks through stack testing.

Based on the definition of an "Environmental Rating" in 6 NYCRR 212.9, the Particulates emission from NYOFCO have been assigned an environmental rating of "A". For Particulates with an environmental rating of "A", where the emission rate potential is less than 1.0 lb/hr in Table 2, the permissible emission rate shall be specified by the Commissioner. Based on the facility's flow rate of 25,000 dscf/min and a Particulate emission rate of 1.6 lb/hr per dryer train (or 9.6 lb/hr for all six dryer trains), the degree of air cleaning required is 99% or greater or BACT must be installed. When the emission rate potential (ERP) is equal to or greater than 1.0 lb/hr for the New York City metropolitan area, then the degree of control of 99% or greater or install BACT is required. Therefore, either 99% or greater air cleaning or BACT (Best Available Control Technology) is required for Particulate emissions from this source (each of the six dryer trains).

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.008 grains per dry standard cubic foot (Corrected to 1% CO₂)

Reference Test Method: PART 60, App A, M 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-23: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007



Applicable Federal Requirement: 6NYCRR 212.9(b)

Item 1-23.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 001

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

Item 1-23.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Based on the definition of an "Environmental Rating" in 6 NYCRR 212.9, the Particulates emission from NYOFCo have been assigned an environmental rating of "A". The "A" environmental rating is defined as "An air contaminant whose discharge results, or may result, in serious adverse effects on receptors or the environment. These effects may be of a health, economic or aesthetic nature or any combination of these."

The degree of air cleaning required for Particulates is determined by Table 2 of 212.9(b), as defined by the emission rate potential (ERP) in lb/hr. Based on the emission rate potential in lb/hr for the Particulates, this facility is given an environmental rating of "A". The facility must control all "A" rated contaminants by 99 % from uncontrolled emissions, or use Best Available Control Technology (BACT) to control emissions from that emission source.

No person will cause or allow emissions that violate the requirement specified in Table 2, 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the Commissioner. Either 99% or greater air cleaning or BACT (Best Available Control Technology) is required for Particulate emissions from this source (each of the six dryer trains). The degree of air cleaning required as specified by the Commissioner depends on the emission rate potential and when it equals or exceeds 1.0 lb/hr for the New York City metropolitan area, the facility must achieve 99 % degree of control (air cleaning) or greater or



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install BACT. If the ERP was under 1.0 lb/hr, then the degree of air cleaning shall be specified by the Commissioner.

For Particulates with an environmental rating of "A", where the emission rate potential is less than 1.0 lb/hr in Table 2, the permissible emission rate shall be specified by the Commissioner. Based on the facility's flow rate of 25,000 dscf/min and a Particulate emission rate of 1.6 lb/hr per dryer train (or 9.6 lb/hr for all six dryer trains), the degree of air cleaning required is 99% or greater or BACT must be installed. When the emission rate potential (ERP) is equal to or greater than 1.0 lb/hr, then the degree of control of 99% or greater or install BACT is required.

At NYOFCo, each of the six dryer trains (Emission Sources 0001A, 0001B, 0001C, 0001D, 0001E and 0001F) is connected to control equipments of a cyclone and a venturi scrubber, and are identified as Emission Controls 001A1, 001B1, 001C1, 001D1, 001E1, and 001F1 for the cyclones, and as Emission Controls 001A2, 001B2, 001C2, 001D2, 001E2, and 001F2 for the venturi scrubbers. The control equipment must be in operation whenever the facility is operational, which is 365 days/year and 24 hours/day.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 99 percent reduction by weight

Reference Test Method: EPA Approved Methods

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 1-24: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

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

Item 1-24.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001

Process: 001

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Item 1-24.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average utilizing a continuous opacity monitor.

This condition applies to combustion installation sources at NYOFCo, which are the six dryers with Emission Sources 0001A, 0001B, 0001C, 0001D, 0001E & 0001F at Emission Unit U-00001, emission Point 00001, and Process 001. The total heat input for all six dryers is 241.74 MM Btu/hr.

Manufacturer Name/Model Number: Continuous Opacity Monitoring System (COMS)

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: CONTINUOUS

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2005.

Subsequent reports are due every 3 calendar month(s).

Condition 1-25: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 40CFR 61.50, NESHAP Subpart E

Item 1-25.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001

Process: 001

Regulated Contaminant(s):

CAS No: 007439-97-6 MERCURY

Item 1-25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING



Monitoring Description:

The applicable NESHAP regulations limits emissions of Mercury to 3,200 grams of mercury per 24-hour period, or 7.1 pounds per 24-hour period. Emission results from the June, 2000 stack test resulted in the following Mercury emissions, in terms of pounds per day: 0.0035 For Unit # 1, 0.0000016 for Unit # 2, 0.0033 for Unit # 6. Emission results from the December, 2002 through January, 2003 stack test resulted in the following Mercury emissions, in terms of pounds per day: 0.0011 for Unit # 1, 0.00095 for Unit # 2, 0.00090 for Unit # 3, 0.0011 for Unit # 4, 0.0015 for Unit # 5, and 0.0014 for Unit # 6.

Since all of the previous stack testing conducted at NYOFCO concluded that the Mercury emissions were well below 1,600 grams per 24-hour period, therefore, NYOFCO is not required to conduct annual sludge sampling and analysis. EPA believes that one stack test for mercury emissions per permit term is appropriate periodic monitoring given the type of facility and the data from the previously-conducted stack test programs.

Therefore, NYOFCO should incorporate monitoring of Mercury emissions, of a periodic time-frame to assure compliance with the emission limitation. EPA believes that one stack test per permit term is appropriate periodic monitoring given the type of facility and the data from the previously conducted stack tests. Therefore, NYOFCO is required to stack test for Mercury once during the term of the permit to demonstrate compliance with the Mercury emission standard. Emissions to the atmosphere from sludge incineration plants, sludge drying plants, or a combination of these that process wastewater treatment plant sludges shall not exceed 3200 grams of Mercury per 24-hour period. This amounts to 7.1 pounds per 24-hour period.

As an alternative means to stack testing for demonstrating compliance with the emission standard, an owner or operator may follow the procedures found in 40CFR61.54 for sludge sampling. Either a one-time test or a one-time sludge analysis is required. The exception is for sludge drying facilities where Mercury emissions exceed 1,600 grams per 24-hour period, in which case annual sludge sampling is required. Because previous stack sampling indicated Mercury emissions were well below



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this value, annual analyses would not be required.

Upper Permit Limit: 1,600 grams per day

Reference Test Method: Method 101A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 24 HOUR DAILY AVERAGE (ARITHMETIC
MEAN)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-26: Compliance Certification

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable Federal Requirement: 40CFR 61.53(d), NESHAP Subpart E

Item 1-26.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 001

Regulated Contaminant(s):
CAS No: 007439-97-6 MERCURY

Item 1-26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Sludge sampling, as an alternative means to stack testing for demonstrating compliance with the mercury emission standard, is required from all sources for which mercury emissions exceed 1,600 grams per 24-hour period, demonstrated either by stack sampling according to 40CFR61.53 or sludge sampling according to 40CFR61.54, shall monitor mercury emissions at intervals of at least once per year by use of Method 105 of 40CFR61 Appendix B or use the procedures specified in 40CFR61.53 (d)(2) and (4).

NYOFCO is required to stack test for Mercury once during the term of the permit to demonstrate compliance with the Mercury emission standard. Emissions to the atmosphere from sludge incineration plants, sludge drying plants, or a combination of these that process wastewater treatment plant sludges shall not exceed 3200 grams of Mercury per 24-hour period. This amounts to 7.1 pounds per 24-hour period. Stack Testing Method 101A in Appendix B to



40CFR61 shall be used to test emissions as follows:

(1) The test shall be performed within 90 days of startup in the case of a new source. Existing sources were to be tested within 90 days of the effective date of 40CFR61 Subpart E.

(2) The Administrator shall be notified at least 30 days prior to an emission test, so that he may at his option observe the test.

(3) Samples shall be taken over such a period or periods as are necessary to determine accurately the maximum emissions which will occur in a 24-hour period. No changes shall be made in the operation which would potentially increase emissions above the level determined by the most recent stack test, until the new emission level has been estimated by calculation and the results reported to the Administrator.

(4) All samples shall be analyzed and mercury emissions shall be determined within 30 days after the stack test. Each determination shall be reported to the Administrator by a registered letter dispatched within 15 calendar days following the date such determination is completed.

(5) Records of emission test results and other data needed to determine total emissions shall be retained at the source and shall be made available, for the inspection by the Administrator, for a minimum of 2 years.

As an alternative means to stack testing for demonstrating compliance with the emission standard, an owner or operator may follow the procedures found in 40CFR61.54 for sludge sampling.

All sources for which Mercury emissions exceed 1,600 grams per 24-hour period, demonstrated either by stack sampling according to 40CFR61.53 or sludge sampling according to 40CFR61.54, shall monitor Mercury emissions at intervals of at least once per year by use of Method 105 of 40CFR61 Appendix B or use the procedures specified in 40CFR61.53 (d)(2) and (4). The results of monitoring shall be reported by a registered letter dispatched within 15 calendar days following the date samples are analyzed. Records of sampling results shall be retained at the source and made available for inspection for a minimum of

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2 years.

Parameter Monitored: MERCURY

Upper Permit Limit: 3200 grams per day

Reference Test Method: App B, EPA Method 101A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 24 HOUR DAILY AVERAGE (ARITHMETIC
MEAN)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 1-27: Contaminant List

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable State Requirement: ECL 19-0301

Item 1-27.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this

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permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000630-08-0
Name: CARBON MONOXIDE

CAS No: 0NY100-00-0
Name: HAP

CAS No: 007783-06-4
Name: HYDROGEN SULFIDE

CAS No: 007439-97-6
Name: MERCURY

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

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 007446-09-5
Name: SULFUR DIOXIDE

CAS No: 0NY998-00-0
Name: VOC

Condition 43: Unavoidable noncompliance and violations
Effective between the dates of 08/30/2002 and 08/29/2007

Applicable State Requirement: 6NYCRR 201-1.4

Item 43.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

- (a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports



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for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superseded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 47: Air pollution prohibited
Effective between the dates of 08/30/2002 and 08/29/2007

Applicable State Requirement: 6NYCRR 211.2

Item 47.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 48: Compliance Demonstration
Effective between the dates of 08/30/2002 and 08/29/2007

Applicable State Requirement: 6NYCRR 211.2

Item 48.1:

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The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 48.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

IN ORDER TO PREVENT ODOR INCIDENTS AT RECEPTOR LOCATIONS IN THE NEIGHBORHOOD OF THE PLANT THE OWNER MUST MONITOR THE OPERATION OF THE SIX (6) REGENERATIVE THERMAL OXIDIZERS (RTO) AND OTHER EMISSION CONTROL EQUIPMENT.

1) THE PERMITTEE SHALL CONTINUOUSLY RECORD AND MONITOR THE TEMPERATURE OF THE SIX RTO.

2) THE MONITOR SHALL AUTOMATICALLY SOUND A WARNING SIGNAL WHEN THE TEMPERATURE FALLS BELOW 1600 F AND SHALL AUTOMATICALLY SWITCH OFF THE PROCESSING OF SLUDGE WHEN THE TEMPERATURE FALLS BELOW 1585 F.

3) THE PRESSURE DROP OF THE GAS FLOW ACROSS THE WET VENTURI SCRUBBER AND CYCLONE SHALL BE A MINIMUM OF 18 INCHES OF WATER.

4) THE PERMITTEE SHALL CONTINUOUSLY MONITOR AND RECORD OPACITY, VOLATILE ORGANIC COMPOUNDS AND CARBON MONOXIDE EMISSIONS.

5) THE TIPPING BUILDING AND PROCESS BUILDING (AS THOSE TERMS ARE USED IN PAGE 3 OF THE THE PERMITTEE'S REPORT, "NEW YORK ORGANIC FERTILIZER COMPANY: PLAN FOR CONTROLLING, MONITORING AND RECORDING ODOR INCIDENTS," CITED IN ITEM 49.2, BELOW) SHALL BE ENCLOSED AND UNDER NEGATIVE PRESSURE ADEQUATE TO PREVENT THE

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UNCONTROLLED RELEASE OF AIR FROM THE TIPPING BUILDING AND PROCESS BUILDING DURING ALL WEATHER CONDITIONS, WHEN TWO BAY DOORS ARE OPEN IN BOTH BUILDINGS SIMULTANEOUSLY.

6) EMISSIONS FROM THE TIPPING BUILDING AND PROCESS BUILDING MUST BE VENTED TO THE DRYER AND MUST BE CONTROLLED BY THE WET VENTURI SCRUBBER AND REGENERATIVE THERMAL OXIDIZERS.

7) EXCEPT DURING EMERGENCIES (E.G., THE NEED TO REMOVE SMOLDERING PELLETS), THE TIPPING BUILDING AND THE PROCESS BUILDING MUST EACH HAVE NO MORE THAN TWO BAY DOORS OPEN SIMULTANEOUSLY. EACH SITE GATE, BUILDING DOOR, AND SILO DOOR MUST REMAIN CLOSED EXCEPT TO ALLOW VEHICLES, EQUIPMENT, OR PERSONNEL TO PASS THROUGH SUCH GATE OR DOOR.

8) WITHIN THIRTY DAYS FOLLOWING THE ISSUANCE OF THE INSTANT PERMIT, THE PERMITTEE MUST SUBMIT TO THE DEPARTMENT A PROPOSAL TO EFFECTIVELY CONTROL (A) THE ODORS OF AIR THAT IS DISPLACED FROM RAIL CARS WHEN SUCH CARS ARE LOADED AT THE SUBJECT FACILITY AND (B) ODORS ASSOCIATED WITH WEAR AND TEAR OF THE FACILITY'S PELLET TRANSPORT LINES, WHEN THAT WEAR AND TEAR RESULTS IN THE SPILLAGE OF PELLETS. WITHIN FIFTEEN DAYS OF THE DATE OF ANY DEPARTMENTAL CORRESPONDENCE OR DISCUSSION WITH THE PERMITTEE REGARDING SUCH PROPOSAL, THE PERMITTEE SHALL PROVIDE, IN TRIPLICATE, ALL THE INFORMATION REQUESTED BY THE DEPARTMENT IN SUCH CORRESPONDENCE OR DISCUSSION. IMMEDIATELY UPON THE DEPARTMENT'S APPROVAL OF SUCH PROPOSAL, THE OPERATION OF THE SUBJECT FACILITY MUST CONFORM TO SUCH PROPOSAL.

Parameter Monitored: HYDROGEN SULFIDE
Upper Permit Limit: 0.001 parts per million by volume
(dry, corrected to 7% O₂)



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Monitoring Frequency: CONTINUOUS
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 49: Compliance Demonstration
Effective between the dates of 08/30/2002 and 08/29/2007

Applicable State Requirement: 6NYCRR 211.2

Item 49.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 49.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The subject facility operation shall conform to the following undated documents prepared by Permittee, and submitted to the Department under a cover letter dated July 1, 2002: (a) "New York Organic Fertilizer Company: Plan for Controlling, Monitoring and Recording Odor Incidents," including all appendices and attachments and (b) "New York Organic Fertilizer Company: CEM Validation Procedure," including all attachments."

REPORTS of i) odor complaints received by NYOFCO; ii) of odor complaints investigated by NYOFCO and, iii) of corrective measures implemented by NYOFCO in response to the odor complaints, shall be submitted to NYSDEC on the 1st and on the 15th of every month.

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 50: Compliance Demonstration
Effective between the dates of 08/30/2002 and 08/29/2007

Applicable State Requirement: 6NYCRR 211.2

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Item 50.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 50.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

HYDROGEN SULFIDE EMISSIONS SHALL NOT EXCEED THE FOLLOWING RATES FOR HOURLY (LBS/HR) AND YEARLY (LBS/YEAR) EMISSIONS FOR ALL SIX (6) DRYERS IN AGGREGATE:

(i) 0.2475 POUNDS PER HOUR

AND

(ii) 1950 POUNDS PER YEAR.

IN ADDITION THE OWNER MUST STACK TEST ALL SIX DRYING TRAINS FOR HYDROGEN SULFIDE EMISSIONS BY DECEMBER 31, 2002. THE STACK TEST MUST BE CONDUCTED AS OUTLINED IN PERMIT CONDITION NUMBER 50.

Parameter Monitored: HYDROGEN SULFIDE

Upper Permit Limit: 0.2475 pounds per hour

Reference Test Method: USEPA METHOD 16

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-28: Compliance Demonstration

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable State Requirement: 6NYCRR 231-1.2(a)(4)

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Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140



Item 1-28.1:

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

Emission Unit: U-00001

Item 1-28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The total facility operating hours for all six dryer-trains shall not exceed 47,304 hours for any consecutive 12-month period. The permittee shall log the hours of operation on a daily basis, and compute the operating hours on a monthly basis.

NYOFCO shall submit to NYSDEC semi-annual (calendar) reports with the total hours of operation for that period.

Work Practice Type: HOURS PER YEAR OPERATION

Upper Permit Limit: 47,304 hours

Monitoring Frequency: DAILY

Averaging Method: ANNUAL MAXIMUM ROLLED DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

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

Condition 1-29: Compliance Demonstration

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable State Requirement: 6NYCRR 231-1.2(a)(4)

Item 1-29.1:

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

Emission Unit: U-00001

Emission Unit: U-00001 Emission Point: 00001
Process: 001 Emission Source: 0001A

Emission Unit: U-00001 Emission Point: 00001



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Process: 001	Emission Source: 0001B
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 0001C
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 0001D
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 0001E
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 0001F
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001A1
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001A2
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001A3
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001AA
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001B1
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001B2
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001B3
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001BB
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001C1
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001C2
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001C3



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Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001CC
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001D1
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001D2
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001D3
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001DD
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001E1
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001E2
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001E3
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001EE
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001F1
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001F2
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001F3
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 001FF
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 0PITA
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 0PITB
Emission Unit: U-00001 Process: 001	Emission Point: 00001 Emission Source: 0PITC

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Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 1-29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The actual annual facility-wide emissions are limited as follows:

(A) The volatile organic compounds emissions shall not exceed 50 tons per year (TPY) based on a 365-day rolling average computed on a daily basis;

(B) The Particulates emissions shall not exceed 5.45 TPY based on a 12-month rolling average computed on a monthly basis, (This is not monitored by CEMS, stack testing determines the emission amounts)

(C) The Carbon Monoxide emissions shall not exceed 47.3 TPY based on a 12-month rolling average computed on a monthly basis;

(D) The Sulfur Dioxide emissions shall not exceed 8.05 TPY based on a 12-month rolling average computed on a monthly basis; (This is not monitored by CEMS, fuel sulfur content analysis determines the emission amounts)

(E) The Nitrogen Oxides emissions shall not exceed 75.05 TPY based on a 12-month average computed on a monthly basis; (This is not monitored by CEMS, stack testing determines the emission amounts)

The total facility operating hours for all six dryer-trains shall not exceed 47,304 hours for any consecutive 12-month period. The permittee shall log the hours of operation daily and compute the operating hours on a monthly basis.

The owner shall submit to NYSDEC semi-annual (calendar) reports with the amounts and rolling averages of the above-noted emissions and hours of operation.

Manufacturer Name/Model Number: BDENSEEWERK PERKIN ELMER GMBH

Upper Permit Limit: 47.3 tons per year



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Reference Test Method: METHOD 7, 25
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/2005.
Subsequent reports are due every 3 calendar month(s).

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

Condition 1-30: Compliance Demonstration

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable State Requirement: 6NYCRR 211.2

Item 1-30.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 1-30.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Hydrogen sulfide emission shall not exceed the rate of
1,950 pounds per year for yearly emissions for all six
dryers in aggregate.

The hydrogen sulfide emission limitation shall be verified
through stack test that will be conducted every three
years. As per Condition # 1-32, NYOFCO must stack test
all six drying trains by January 28, 2006. The stack test
must be conducted as outlined in permit Condition # 1-32
(old Condition # 51).

NYOFCO must stack test all six drying trains for hydrogen
sulfide emissions by January 28, 2006. Stack testing of
all six stacks should be performed three years after the
completion of the previous tests, which was achieved on
January 28, 2003. Therefore, the next required stack test



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must be conducted by January 28, 2006. NYOFCO is to demonstrate compliance with the hydrogen sulfide emission limit of 0.2475 pounds per hour through stack testing.

Parameter Monitored: HYDROGEN SULFIDE

Upper Permit Limit: 1,950 pounds per year

Reference Test Method: EPA Method 16

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-31: Compliance Demonstration

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable State Requirement: 6NYCRR 211.2

Item 1-31.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001

Regulated Contaminant(s):

CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 1-31.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Hydrogen sulfide emission shall not exceed the rate of 0.2475 pounds per hour for hourly emissions for all six dryers in aggregate.

The hydrogen sulfide emission limitation shall be verified through stack test that will be conducted every three years. As per Condition # 1-32, NYOFCO must stack test all six drying trains by January 28, 2006. The stack test must be conducted as outlined in permit Condition # 1-32 (old Condition # 51).

NYOFCO must stack test all six drying trains for hydrogen sulfide emissions by January 28, 2006. Stack testing of all six stacks should be performed three years after the completion of the previous test, which was achieved on January 28, 2003. Therefore, the next required stack test



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must be conducted by January 28, 2006. NYOFCO is to demonstrate compliance with the hydrogen sulfide emission limit of 0.2475 pounds per hour through stack testing.

Parameter Monitored: HYDROGEN SULFIDE

Upper Permit Limit: 0.2475 pounds per hour

Reference Test Method: EPA Method 16

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-32: Compliance Demonstration

Effective between the dates of 09/01/2005 and 08/29/2007

Applicable State Requirement: 6NYCRR 212.4(b)

Item 1-32.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 001

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

Item 1-32.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

NYOFCO must test the emission rates of the following air pollutants:

i) METALS:

Lead
Nickel
Mercury
Chromium
Hexavalent Chromium

ii) SEMI-VOLATILE VOCs:

Di-N-Buthyl-Phthalate (CAS # 84-74-2)
Di-N-Octyl-Phthalate (CAS # 117-84-0)



Di-Octyl-Phthalate (CAS # 117-81-7)

iii) POLYCYCLIC AROMATIC HYDROCARBONS
(PAH):

Naphthalene
2-Methylnaphthalene
Acenaphthalene
Acenaphthene
Fluorene
Phenanthrene
Anthracene
Fluoranthrene
Pyrene
Benze(a)anthracene
Chrysene
Benzo(b)fluoranthene
Benzo(k)fluoranthene
Benzo(e)pyrene
Benzo (a)pyrene
Perylene
Indenol(1,2,3 -c,d) dypereene
Dibenzo(a,h) Anthracene
Benzo(g,h,1)perylene

AND TOTAL PAH:

iv) INORGANICS

Hydrogen Sulfide
Ammonia
Hydrogen Chloride
Carbon Disulfide
Total Particulate Matter
CO
NO₂
Hydrochloric Acid

v) Total VOCs (not speciated)

vi) The Overall Destruction Efficiency = RTO's destruction efficiency x capture efficiency (using Method 204 = 81 % (minimum)

NYOFCO must stack test all six stacks (one stack for each of the six drying trains, Emission Sources 0001A, 0001B, 0001C, 0001D, 0001E & 0001F) for the above listed

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pollutants.

- 1) A test protocol must be submitted to NYSDEC by October 1, 2002.
- 2) The testing must be completed by December 31, 2002.
- 3) A final test report with all emission rate results for all six stacks must be submitted to NYSDEC by March 1, 2003.
- 4) By April 1, 2002, NYOFCO must perform and submit to NYSDEC an Airguide-1 analysis to determine the impacts caused by the above listed contaminants. Airguide-1 is a NYSDEC guideline document that establishes acceptable ambient air concentrations for toxic contaminants. Based on the test results, NYOFCO's analysis should establish the short term and the long term impacts caused by these contaminants. The impacts must be lower than the short term guideline concentration (STGC) and the annual guideline concentration (AGC) for each contaminant tested.

The sludge used during the stack tests must be selected according to a "MATRIX" or mixture of sludges selected from various NYSDEP water treatment plants. NYOFCO is required to submit the proposed "MATRIX" to NYSDEC with the test protocol.

As per old Condition # 51 (Condition # 1-32), NYOFCO must stack test all six drying trains by January 28, 2006. Stack testing of all six stacks should be performed three years after the completion of the previous tests, which was achieved on January 28, 2003. Therefore, the next required stack test must be conducted by January 28, 2006. The stack test must be conducted as outlined in permit old Condition # 51 (Condition 1-32).

Upper Permit Limit: 300 pounds per year

Reference Test Method: USEPA Methods

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-33: Compliance Demonstration



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Effective between the dates of 09/01/2005 and 08/29/2007

Applicable State Requirement: 6NYCRR 212.4(b)

Item 1-33.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00001 Emission Point: 00001
Process: 001

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 1-33.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The overall destruction efficiency must be equal to or higher than 81 % for each of the six RTOs associated with all six drying trains at NYOFCo.

As per old Condition # 51 (Condition 1-32), NYOFCO must stack test all six drying trains by January 28, 2006. Stack testing of all six stacks should be performed three years after the completion of the previous tests, which was achieved on January 28, 2003. Therefore, the next required stack test must be conducted by January 28, 2006. The stack test must be conducted as outlined in permit old Condition # 51 (Condition # 1-32).

This condition is the Intermittent Emission Testing for the RTO's destruction efficiency and the Overall destruction efficiency for each of the six RTOs associated with all six drying trains at NYOFCo. This condition was contained in Condition 1-32 (former Condition 51). As was discussed and explained in the 11/4/2004 meeting between NYOFCo's representative and DEC staff, the facility is required to determine the capture efficiency using 40 CFR 51, Appendix M, Method 204 for "Permanent Total Enclosure", in addition to determining the RTO's destruction efficiency for each of the six RTOs.

The RTO's destruction efficiency is measured by EPA's Method 25A, by measuring the overall reduction in volatile organic compound emissions, by measuring the amount of VOC

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entering the RTO, and the amount of VOC exiting the RTO.
Therefore;

The RTO's destruction efficiency = (VOC entering RTO - RTO
exiting RTO) / VOC entering RTO x 100 %

The Overall Destruction Efficiency = RTO's destruction
efficiency x capture efficiency (using Method 204) =
81 % (minimum)

NYOFCo is required to demonstrate compliance with the 81 %
minimum overall reduction efficiency for VOC emission for
each of the six drying trains through stack testing. In
previous stack tests, NYOFCo has demonstrated the RTO's
destruction efficiency to be about 97.7 %.

Manufacturer Name/Model Number: Regenerative Thermal Oxidizer (RTO)

Lower Permit Limit: 97.7 percent

Reference Test Method: USEPA Methods

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION