



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 2-6007-00140/00011  
Effective Date:

Expiration Date:

Permit Issued To: SYNAGRO-WWT INC  
1800 BERING DR STE 1000  
HOUSTON, TX 77057

Contact: JOHN Z KOPEC  
NEW YORK ORGANIC FERTILIZER  
1108 OAK POINT AVE  
BRONX, NY 10474  
(718) 991-7417

Facility: NYOFKO SLUDGE PELLETTIZATION FACILITY  
1108 OAK POINT AVE  
BRONX, NY 10474

Contact: ALAN PARRY  
NYOFKO SLUDGE PELLETTIZATION FACILITY  
1108 OAK POINT AVE  
BRONX, NY 10474  
(718) 991-7417

Description:

**PERMIT DESCRIPTION**  
**NYOFKO Sludge Pelletization Facility**  
**DEC ID # 2-6007-00140/00011 ATV Ren 1 Mod 0**

Title V Permit Renewal Application - 300 dry tons per day Sewage Plant Sludge Drying and Pelletization Facility.

This is a Title V renewal that incorporates the two following Air State Facility (ASF) Permits:

1. DEC ID # 2-6007-00140/00013, issued on 12/06/2005 for the Odor Control Scrubber in the Tipping area, and
2. DEC ID # 2-6007-00140/00015, issued on 1/29/2007 for the Flue Gas Recirculation (FGR) on Drying Trains 4, 5 & 6.

The Title V Permit Renewal Application defines the following seven (7) Emission Units:

Emission Unit U-00001 - Sludge Drying / Pelletization Train #1  
Emission Unit U-00002 - Sludge Drying / Pelletization Train #2  
Emission Unit U-00003 - Sludge Drying / Pelletization Train #3  
Emission Unit U-00004 - Sludge Drying / Pelletization Train #4  
Emission Unit U-00005 - Sludge Drying / Pelletization Train #5  
Emission Unit U-00006 - Sludge Drying / Pelletization Train #6



**New York State Department of Environmental Conservation**  
**Facility DEC ID: 2600700140**

Emission Unit U-00007 - Odor Scrubber for Main Building Ventilation

Emission Units U-00001, U-00002, U-00003, U-00004, U-00005 & U-00006 refer to the six (6) drying trains that process the wet sludge by drying and pelletizing the dried material for shipment to various customers. Each Unit includes a low NO<sub>x</sub> dryer burner, a dust cyclone, a high energy venturi scrubber for particulates, NO<sub>x</sub> and odor control, and a Regenerative Thermal Oxidizer (RTO) for Volatile Organic Compounds (VOC) destruction. In addition, Units U-00004, U-00005 & U-00006 each include a Flue Gas Recirculation (FGR) system for more enhanced control.

Emission Unit U-00007 is a wet chemical scrubber and air ventilation system, which is a major component of the tipping building's odor controls.

NYOFCo must perform stack tests to determine the emission rates of all six stacks (one stack for each of the six drying trains).

The facility operates other sources which are considered exempt from permitting in accordance with 6 NYCRR 201-3.2 ( c), including the following:

1. Six McQuay 2,250,000 RPS080C Rooftop Heating / Cooling Units (each <10 MM Btus of heat input per hour),
2. Three Detroit Radiant DTHS-60-150N 150,000 BTU/hr heaters in the Tipping Bldg (each <10 MM Btus of heat input per hour),
3. One Model GFUH-A (make unknown) 96,000 BTU/hr heater in the Tipping Bldg (<10 MM Btus of heat input per hour),
4. Two FGR non contact Cooling Towers: Baltimore Air Coil Model 3482A-2,
5. One pellet cooler non contact Cooling Tower: Baltimore Air Coil Model VTI-N220,
6. One aqueous parts (non-vapor phase) cleaning equipment,
7. Two above ground kerosene storage tanks (15,000 gallons - 357 barrel capacity),
8. One underground kerosene storage tank (UST at 10,000 gallons - 238 barrels),
9. Eight product silos,
10. One Generac SD230 #2 oil fired generator for the odor scrubber in the event of a power outage (operating <500 hours per year), and
11. One Generac SD35 #2 oil fired generator for the silos dust collection equipment in the event of a power outage (operating <500 hours per year).

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  
  NYSDEC

New York State Department of Environmental Conservation

Facility DEC ID: 2600700140



47-40 21ST ST  
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 compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



**CONDITIONS**

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**Facility Level**

- 6 5 Submission of application for permit modification or renewal-REGION 2 HEADQUARTERS



**DEC GENERAL CONDITIONS**

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

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

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

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

**Applicable State Requirement: ECL 3-0301.2(m)**

**Item 2.1:**

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

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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



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

**Item 4.1:**

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.

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

**Condition 5: Submission of application for permit modification or renewal-REGION 2 HEADQUARTERS**  
**Applicable State Requirement: 6NYCRR 621.6(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



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: SYNAGRO-WWT INC  
1800 BERING DR STE 1000  
HOUSTON, TX 77057

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

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

Permit Effective Date:

Permit Expiration Date:



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- 48 44 ECL 19-0301: Contaminant List
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- 50 46 6NYCRR 201-1.10(b): Compliance Demonstration
- 50 47 6NYCRR 211.2: Air pollution prohibited
- 51 48 6NYCRR 211.2: Compliance Demonstration
- 51 49 6NYCRR 211.2: Compliance Demonstration
- 53 50 6NYCRR 211.2: Compliance Demonstration
- 54 51 6NYCRR 211.2: Compliance Demonstration
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- 61 59 6NYCRR 212.4(a): Compliance Demonstration
- 62 60 6NYCRR 212.10: Compliance Demonstration
- 63 61 6NYCRR 225-1.8: Compliance Demonstration
- 64 62 6NYCRR 257-1.4: Compliance Demonstration

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**EU=U-00007,EP=EP007,Proc=ODR,ES=OXRDP**

- 64 63 6NYCRR 211.2: Compliance Demonstration

**EU=U-00007,EP=EP007,Proc=ODR,ES=STAG1**

- 65 64 6NYCRR 211.2: Compliance Demonstration

**EU=U-00007,EP=EP007,Proc=ODR,ES=STAG2**

- 66 65 6NYCRR 211.2: 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: 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 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 B: 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 C: 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 D: 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 E: 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 renewal application.
- Item F: 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 G: 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 H: 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 I: 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 J: 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 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 K: 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 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 L: Permit Exclusion - ECL 19-0305**

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS 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: Acceptable Ambient Air Quality  
Effective for entire length of Permit**





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 5: Compliance Certification  
Effective for entire length of Permit**

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

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

Compliance Certification shall include the following monitoring:

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 (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 requirement shall apply.

If above paragraphs (1) or (2) 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) and (2) 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 paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

seeks The provisions of 6 NYCRR 201-1.4 shall apply if the permittee

to have a violation excused unless otherwise limited by regulation. 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. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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.

six In the case of any emission testing performed during the previous

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.

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 Quality Assurance



(BQA) 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: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

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

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
  - 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.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. 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.

iv. 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 pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) 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 BQA is as follows:

NYSDEC  
Bureau of Quality Assurance  
625 Broadway  
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 4/30/2010.  
Subsequent reports are due on the same day each year

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

**Applicable Federal Requirement:6NYCRR 202-2.1**

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

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. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251





**Condition 11: Recycling and Salvage**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6NYCRR 201-1.7**

**Item 11.1:**

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 the ECL.

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6NYCRR 201-1.8**

**Item 12.1:**

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.

**Condition 13: Exempt Sources - Proof of Eligibility**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6NYCRR 201-3.2(a)**

**Item 13.1:**

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 this Subpart. 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 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.

**Condition 14: Trivial Sources - Proof of Eligibility**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6NYCRR 201-3.3(a)**

**Item 14.1:**

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. 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 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.

**Condition 15: Standard Requirement - Provide Information**  
**Effective for entire length of Permit**



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

**Item 15.1:**

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.

**Condition 16: General Condition - Right to Inspect  
Effective for entire length of Permit**

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

**Item 16.1:**

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

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

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

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

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

**Condition 17: Standard Requirements - Progress Reports  
Effective for entire length of Permit**

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

**Item 17.1:**

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.

**Condition 18: Off Permit Changes  
Effective for entire length of Permit**



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

**Item 18.1:**

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.

**Condition 19: Required Emissions Tests  
Effective for entire length of Permit**

**Applicable Federal Requirement:6NYCRR 202-1.1**

**Item 19.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

**Condition 20: Visible Emissions Limited  
Effective for entire length of Permit**

**Applicable Federal Requirement:6NYCRR 211.3**

**Item 20.1:**

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.

**Condition 21: Accidental release provisions.  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 68**

**Item 21.1:**





**Item 23.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Whenever the pressure drop across the RTO increases to more than 32 inches of water on a daily average basis, or whenever the hours of operation reach a maximum of 3,000 hours, the ceramic media in the RTOs of dryer trains 1, 2 and 3 shall be cleaned within 10 days, unless NYOFCo is prevented from completing such cleaning due to an emergency or equipment malfunction resulting in the unavailability of an alternative dryer train (in which event, NYOFCo shall notify the Department and complete the media cleaning as soon thereafter as practicable), by vacuuming the ceramic media with a high powered vacuum machine and then washing the ceramic media with water.

A log shall be maintained recording the date, hours of operation since the previous cleaning, and the daily average pressure drop across the RTO prior to the cleaning. The log shall be made available to the Department for inspection.

A log shall also be kept of the daily average pressure drop in each RTO and made available to the Department for inspection.

See related Condition 25.

Parameter Monitored: HOURS OF OPERATION BETWEEN CERAMIC MEDIA CLEANING

Upper Permit Limit: 3,000 hours

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

**Applicable Federal Requirement:6NYCRR 200.7**

**Item 24.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00004  
Process: PR4

Emission Point: EP004  
Emission Source: RTOX4

Emission Unit: U-00005  
Process: PR5

Emission Point: EP005  
Emission Source: RTOX5

Emission Unit: U-00006

Emission Point: EP006



Process: PR6

Emission Source: RTOX6

**Item 24.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Whenever the pressure drop across the RTO increases to more than 32 inches of water on a daily average basis, or whenever the hours of operation reach a maximum of 6,000 hours, the ceramic media in the RTOs of dryer trains 4, 5 and 6 shall be cleaned within 10 days, unless NYOFCo is prevented from completing such cleaning due to an emergency or equipment malfunction resulting in the unavailability of an alternative dryer train (in which event, NYOFCo shall notify the Department and complete the media cleaning as soon thereafter as practicable), by vacuuming the ceramic media with a high powered vacuum machine and then washing the ceramic media with water.

A log shall be maintained recording the date, hours of operation since the previous cleaning, and the daily average pressure drop across the RTO prior to the cleaning. The log shall be made available to the Department for inspection.

A log shall also be kept of the daily average pressure drop in each RTO and made available to the Department for inspection.

See related Condition 25.

Parameter Monitored: HOURS OF OPERATION BETWEEN CERAMIC MEDIA CLEANING

Upper Permit Limit: 6,000 hours

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

**Applicable Federal Requirement:6NYCRR 200.7**

**Item 25.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001  
Process: PR1

Emission Point: EP001  
Emission Source: RTOX1

Emission Unit: U-00002  
Process: PR2

Emission Point: EP002  
Emission Source: RTOX2



Emission Unit: U-00003 Process: PR3	Emission Point: EP003 Emission Source: RTOX3
Emission Unit: U-00004 Process: PR4	Emission Point: EP004 Emission Source: RTOX4
Emission Unit: U-00005 Process: PR5	Emission Point: EP005 Emission Source: RTOX5
Emission Unit: U-00006 Process: PR6	Emission Point: EP006 Emission Source: RTOX6

**Item 25.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Whenever the pressure drop across the RTO increases to more than 32 inches of water on a daily average basis, or whenever the hours of operation reach a maximum of 3,000 hours for dryer trains 1, 2, and 3 or 6,000 hours for dryer trains 4, 5, and 6, the ceramic media shall be cleaned within 10 days, unless NYOFCo is prevented from completing such cleaning due to an emergency or equipment malfunction resulting in the unavailability of an alternative dryer train (in which event, NYOFCo shall notify the Department and complete the media cleaning as soon thereafter as practicable), by vacuuming the ceramic media with a high powered vacuum machine and then washing the ceramic media with water.

A log shall be maintained recording the date, hours of operation since the previous cleaning, and the daily average pressure drop across the RTO prior to the cleaning. The log shall be made available to the Department for inspection.

A log shall also be kept of the daily average pressure drop in each RTO and made available to the Department for inspection.

See related Conditions 23 and 24.

Parameter Monitored: PRESSURE DROP

Upper Permit Limit: 32 inches of water

Monitoring Frequency: CONTINUOUS

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

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

**Applicable Federal Requirement:6NYCRR 201-1.5**



**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: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Kerosene and diesel may be used in an emergency, or during sporadic natural gas shortages, or during test runs to prepare the system for service, or any time NYOFCo is notified by its natural gas supplier (Con Edison) to refrain from using natural gas.

NYOFCo shall not burn more than 508,133 gallons per year of kerosene and/or diesel fuel.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL

Parameter Monitored: FUEL

Upper Permit Limit: 508133 gallons per year

Monitoring Frequency: DAILY

Averaging Method: ANNUAL MAXIMUM ROLLED DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

**Applicable Federal Requirement:6NYCRR 201-1.5**

**Item 27.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 27.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Kerosene and diesel may be used in an emergency, or during sporadic natural gas shortages, or during test runs to prepare the system for service, or any time NYOFCo is notified by its natural gas supplier (Con Edison) to refrain from using natural gas.

NYOFCo shall not burn more than 25,406 gallons per day of kerosene and/or diesel fuel.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL

Parameter Monitored: FUEL

Upper Permit Limit: 25,406 gallons per day

Monitoring Frequency: DAILY



Averaging Method: 24 HOUR MAXIMUM  
Reporting Requirements: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 3 calendar month(s).

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

**Applicable Federal Requirement:6NYCRR 201-1.5**

**Item 28.1:**  
The Compliance Certification activity will be performed for the Facility.

**Item 28.2:**  
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS  
Monitoring Description:

Kerosene and diesel may be used in an emergency, or during sporadic natural gas shortages, or during test runs to prepare the system for service, or any time NYOFCo is notified by its natural gas supplier (Con Edison) to refrain from using natural gas.

NYOFCo shall not burn more than 1,200 gallons per hour of kerosene and/or diesel fuel.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL  
Parameter Monitored: FUEL  
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: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 3 calendar month(s).

**Condition 29: Emission Unit Definition**  
**Effective for entire length of Permit**

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

**Item 29.1:**  
The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00001

Emission Unit Description:

Emission Unit U-00001 is one drying/pelletizing train with a daily capacity to process 50 - 70 dry tons sludge [208 - 291 wet tons with 24% solids content] or equivalent, depending on the moisture content of the sludge. The drying / pelletizing train includes the following equipment: wet cake storage bin, pin mixer, natural gas fired (primary fuel) combination air heater and triple pass rotary dryer utilizing one (1) Low NOx Burner with 30 million Btu heat input capacity, separator vessel, cyclone, venturi with separator, induced / forced



draft fan, regenerative thermal oxidizer, induced draft fan, flue stack, pellet recycle bin, bucket elevators and a vibrating screen.

From the "wet cake storage bin", wet sludge is transferred to the "pin mixer" where the solid content is raised to 70% prior to delivery to the "triple-pass rotary dryer" from which the material solid content is raised typically to 93% or higher. The dryer is 11 feet in diameter and mixes the solid material with hot air at temperatures ranging from 800 F to 900 F. The primary fuel is natural gas with the maximum rate about 29,412 cubic feet per hour. Kerosene and ultra low sulfur diesel fuel are secondary fuel alternatives. The solid material makes a triple pass through the rotary dryer with a retention period of 0.5 to 1.0 hours, depending on the flow rate.

The processed material and hot flue gases exit the rotary dryer into a "separator vessel" where the majority of the solid material is separated from the flue gas stream. The solid material from the vessel is transferred to the "vibrating screen," where product size material (2 - 3 millimeter in diameter) is segmented and sent to the "pellet storage load out facility" and oversized material is recycled through the "pellet recycle bin".

The flue gas exiting the separator vessel is directed to the "cyclone," where large particulate matter remaining in the gas stream is separated and combined with the solid material from the vessel. The flue gas leaving the cyclone is sent to a high-efficiency venturi scrubber / separator, where practically all of the particulate matter and ammonia gas are washed from the flue gas stream. The venturi scrubber provides both particulate emission control and odor control. Sulfuric acid is added to the scrubber liquor to enhance ammonia emission reduction for NOx control. (The solids component of the blow down from the scrubber recycle liquor is returned to the wet cake storage bin after dewatering.) The flue gas from the venturi scrubber is directed to the "regenerative thermal oxidizer" (RTO), where the gas temperature is increased to approximately 1600 degrees Fahrenheit for the destruction of volatile organic compounds [VOC], and subsequently cooled by preheating the incoming flue gas (regeneration), prior to exiting to the atmosphere via the flue stack. The RTO utilizes two (2) burners with a total maximum fuel consumption of 10,000 cubic feet per hour of natural gas at rated capacity. The stack temperature of the flue gas exhaust is about 360 degrees F.

Building(s): 001

**Item 29.2:**

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

Emission Unit: U-00002

Emission Unit Description:

Emission Unit U-00002 is one drying/pelletizing train with a daily capacity to process 50 - 70 dry tons sludge [208 - 291 wet tons with 24% solids content] or equivalent, depending on the moisture content of the sludge. The drying / pelletizing train includes the following equipment: wet cake storage bin, pin mixer, natural gas fired (primary



fuel) combination air heater and triple pass rotary dryer utilizing one (1) Low NOx Burner with 30 million Btu heat input capacity, separator vessel, cyclone, venturi with separator, induced / forced draft fan, regenerative thermal oxidizer, induced draft fan, flue stack, pellet recycle bin, bucket elevators and a vibrating screen.

From the "wet cake storage bin", wet sludge is transferred to the "pin mixer" where the solid content is raised to 70% prior to delivery to the "triple-pass rotary dryer" from which the material solid content is raised typically to 93% or higher. The dryer is 11 feet in diameter and mixes the solid material with hot air at temperatures ranging from 800 F to 900 F. The primary fuel is natural gas with the maximum rate about 29,412 cubic feet per hour. Kerosene and ultra low sulfur diesel fuel are secondary fuel alternatives. The solid material makes a triple pass through the rotary dryer with a retention period of 0.5 to 1.0 hours, depending on the flow rate.

The processed material and hot flue gases exit the rotary dryer into a "separator vessel" where the majority of the solid material is separated from the flue gas stream. The solid material from the vessel is transferred to the "vibrating screen," where product size material (2 - 3 millimeter in diameter) is segmented and sent to the "pellet storage load out facility" and oversized material is recycled through the "pellet recycle bin".

The flue gas exiting the separator vessel is directed to the "cyclone," where large particulate matter remaining in the gas stream is separated and combined with the solid material from the vessel. The flue gas leaving the cyclone is sent to a high-efficiency venturi scrubber / separator, where practically all of the particulate matter and ammonia gas are washed from the flue gas stream. The venturi scrubber provides both particulate emission control and odor control. Sulfuric acid is added to the scrubber liquor to enhance ammonia emission reduction for NOx control. (The solids component of the blow down from the scrubber recycle liquor is returned to the wet cake storage bin after dewatering.) The flue gas from the venturi scrubber is directed to the "regenerative thermal oxidizer" (RTO), where the gas temperature is increased to approximately 1600 degrees Fahrenheit for the destruction of volatile organic compounds (VOCs), and subsequently cooled by preheating the incoming flue gas [regeneration], prior to exiting to the atmosphere via the flue stack. The RTO utilizes two (2) burners with a total maximum fuel consumption of 10,000 cubic feet per hour of natural gas at rated capacity. The stack temperature of the flue gas exhaust is about 360 degrees F.

Building(s): 001

**Item 29.3:**

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

Emission Unit: U-00003

Emission Unit Description:

Emission Unit U-00003 is one drying/pelletizing train with a daily



capacity to process 50 - 70 dry tons sludge [208 - 291 wet tons with 24% solids content] or equivalent, depending on the moisture content of the sludge. The drying / pelletizing train includes the following equipment: wet cake storage bin, pin mixer, natural gas fired (primary fuel) combination air heater and triple pass rotary dryer utilizing one (1) Low NOx Burner with 30 million Btu heat input capacity, separator vessel, cyclone, venturi with separator, induced / forced draft fan, regenerative thermal oxidizer, induced draft fan, flue stack, pellet recycle bin, bucket elevators and a vibrating screen.

From the "wet cake storage bin", wet sludge is transferred to the "pin mixer" where the solid content is raised to 70% prior to delivery to the "triple-pass rotary dryer" from which the material solid content is raised typically to 93% or higher. The dryer is 11 feet in diameter and mixes the solid material with hot air at temperatures ranging from 800 F to 900 F. The primary fuel is natural gas with the maximum rate about 29,412 cubic feet per hour. Kerosene and ultra low sulfur diesel fuel are secondary fuel alternatives. The solid material makes a triple pass through the rotary dryer with a retention period of 0.5 to 1.0 hours, depending on the flow rate.

The processed material and hot flue gases exit the rotary dryer into a "separator vessel" where the majority of the solid material is separated from the flue gas stream. The solid material from the vessel is transferred to the "vibrating screen," where product size material (2 - 3 millimeter in diameter) is segmented and sent to the "pellet storage load out facility" and oversized material is recycled through the "pellet recycle bin".

The flue gas exiting the separator vessel is directed to the "cyclone," where large particulate matter remaining in the gas stream is separated and combined with the solid material from the vessel. The flue gas leaving the cyclone is sent to a high-efficiency venturi scrubber / separator, where practically all of the particulate matter and ammonia gas are washed from the flue gas stream. The venturi scrubber provides both particulate emission control and odor control. Sulfuric acid is added to the scrubber liquor to enhance ammonia emission reduction for NOx control. (The solids component of the blow down from the scrubber recycle liquor is returned to the wet cake storage bin after dewatering.) The flue gas from the venturi scrubber is directed to the "regenerative thermal oxidizer" (RTO), where the gas temperature is increased to approximately 1600 degrees Fahrenheit for the destruction of volatile organic compounds (VOCs), and subsequently cooled by preheating the incoming flue gas (regeneration), prior to exiting to the atmosphere via the flue stack. The RTO utilizes two (2) burners with a total maximum fuel consumption of 10,000 cubic feet per hour of natural gas at rated capacity. The stack temperature of the flue gas exhaust is about 360 degrees F.

Building(s): 001

**Item 29.4:**



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

Emission Unit: U-00004

Emission Unit Description:

Emission Unit U-00004 is one drying/pelletizing train with a daily capacity to process 50 - 70 dry tons sludge [208 - 291 wet tons with 24% solids content] or equivalent, depending on the moisture content of the sludge. The drying / pelletizing train includes the following equipment: wet cake storage bin, pin mixer, natural gas fired (primary fuel) combination air heater and triple pass rotary dryer utilizing one (1) Low NO<sub>x</sub> Burner with 30 million Btu heat input capacity, separator vessel, cyclone, venturi with separator, induced / forced draft fan, regenerative thermal oxidizer, induced draft fan, flue stack, pellet recycle bin, bucket elevators and a vibrating screen.

From the "wet cake storage bin", wet sludge is transferred to the "pin mixer" where the solid content is raised to 70% prior to delivery to the "triple-pass rotary dryer" from which the material solid content is raised typically to 93% or higher. The dryer is 11 feet in diameter and mixes the solid material with hot air at temperatures ranging from 800 F to 900 F. The primary fuel is natural gas with the maximum rate about 29,412 cubic feet per hour. Kerosene and ultra low sulfur diesel fuel are secondary fuel alternatives. The solid material makes a triple pass through the rotary dryer with a retention period of 0.5 to 1.0 hours, depending on the flow rate.

The processed material and hot flue gases exit the rotary dryer into a "separator vessel" where the majority of the solid material is separated from the flue gas stream. The solid material from the vessel is transferred to the "vibrating screen," where product size material (2 - 3 millimeter in diameter) is segmented and sent to the "pellet storage load out facility" and oversized material is recycled through the "pellet recycle bin".

The flue gas exiting the separator vessel is directed to the "cyclone," where large particulate matter remaining in the gas stream is separated and combined with the solid material from the vessel. The flue gas leaving the cyclone is sent to a high-efficiency venturi scrubber / condenser-separator, where practically all of the particulate matter and ammonia gas are washed from the flue gas stream. The venturi scrubber provides both particulate emission control and odor control. Sulfuric acid is added to the scrubber liquor to enhance ammonia emission reduction for NO<sub>x</sub> control. (The solids component of the blow down from the scrubber recycle liquor is returned to the wet cake storage bin after dewatering.)

The flue gas from the venturi scrubber is split with about 50% by volume recirculated to "gas fired air heater," and the remaining 50% directed to the "regenerative thermal oxidizer" (RTO). The installation of "flue gas recirculation" [FGR] as part of Emission Unit U-00004 was completed on March 21, 2005, and is operational. The FGR must be operated at all times whenever sludge is being dried/processed in Emission Unit U-00004.



In the RTO, the gas temperature is increased to approximately 1600 degrees Fahrenheit for the destruction of volatile organic compounds (VOC), and subsequently cooled by preheating the incoming flue gas (regeneration), prior to exiting to the atmosphere via the flue stack. The RTO utilizes two (2) burners with a total maximum fuel consumption of 10,000 cubic feet per hour of natural gas at rated capacity. The stack temperature of the flue gas exhaust is about 360 degrees F.

The RTO equipment for EU4, EU5, and EU6 are connected by a manifold with isolation dampers such that each individual oxidizer can be operated with Emission Unit U-00004, and/or Emission Unit U-00005 and/or Emission Unit U-00006.

Building(s): 001

**Item 29.5:**

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

Emission Unit: U-00005

Emission Unit Description:

Emission Unit U-00005 is one drying/pelletizing train with a daily capacity to process 50 - 70 dry tons sludge [208 - 291 wet tons with 24% solids content] or equivalent, depending on the moisture content of the sludge. The drying / pelletizing train includes the following equipment: wet cake storage bin, pin mixer, natural gas fired (primary fuel) combination air heater and triple pass rotary dryer utilizing one (1) Low NOx Burner with 30 million Btu heat input capacity, separator vessel, cyclone, venturi with separator, induced / forced draft fan, regenerative thermal oxidizer, induced draft fan, flue stack, pellet recycle bin, bucket elevators and a vibrating screen.

From the "wet cake storage bin", wet sludge is transferred to the "pin mixer" where the solid content is raised to 70% prior to delivery to the "triple-pass rotary dryer" from which the material solid content is raised typically to 93% or higher. The dryer is 11 feet in diameter and mixes the solid material with hot air at temperatures ranging from 800 F to 900 F. The primary fuel is natural gas with the maximum rate about 29,412 cubic feet per hour. Kerosene and ultra low sulfur diesel fuel are secondary fuel alternatives. The solid material makes a triple pass through the rotary dryer with a retention period of 0.5 to 1.0 hours, depending on the flow rate.

The processed material and hot flue gases exit the rotary dryer into a "separator vessel" where the majority of the solid material is separated from the flue gas stream. The solid material from the vessel is transferred to the "vibrating screen," where product size material (2 - 3 millimeter in diameter) is segmented and sent to the "pellet storage load out facility" and oversized material is recycled through the "pellet recycle bin".

The flue gas exiting the separator vessel is directed to the "cyclone," where large particulate matter remaining in the gas stream is separated and combined with the solid material from the vessel.



The flue gas leaving the cyclone is sent to a high-efficiency venturi scrubber / condenser-separator where practically all of the particulate matter and ammonia gas are washed from the flue gas stream. The venturi scrubber provides both particulate emission control and odor control. Sulfuric acid is added to the scrubber liquor to enhance ammonia emission reduction for NO<sub>x</sub> control. (The solids component of the blow down from the scrubber recycle liquor is returned to the wet cake storage bin after dewatering.)

The flue gas from the venturi scrubber is split with about 50% by volume recirculated to "gas fired air heater," and the remaining 50% directed to the "regenerative thermal oxidizer" (RTO). The installation of "flue gas recirculation" [FGR] as part of Emission Unit U-00005 was completed on November 11, 2005, and is operational. The FGR must be operated at all times whenever sludge is being dried/processed in Emission Unit U-00005.

In the RTO, the gas temperature is increased to approximately 1600 degrees Fahrenheit for the destruction of volatile organic compounds [VOC], and subsequently cooled by preheating the incoming flue gas [regeneration], prior to exiting to the atmosphere via the flue stack.

The RTO utilizes two (2) burners with a total maximum fuel consumption of 10,000 cubic feet per hour of natural gas at rated capacity. The stack temperature of the flue gas exhaust is about 360 degrees F.

The RTO equipment for Emission Unit U-00004, U-00005, and U-00006 are connected by a manifold with isolation dampers such that each individual oxidizer can be operated with Emission Unit U-00004, and/or Emission Unit U-00005, and/or Emission Unit U-00006.

Building(s): 001

**Item 29.6:**

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

Emission Unit: U-00006

Emission Unit Description:

Emission Unit U-00006 is one drying/pelletizing train with a daily capacity to process 50 - 70 dry tons sludge [208 - 291 wet tons with 24% solids content] or equivalent, depending on the moisture content of the sludge. The drying / pelletizing train includes the following equipment: wet cake storage bin, pin mixer, natural gas fired (primary fuel) combination air heater and triple pass rotary dryer utilizing one (1) Low NO<sub>x</sub> Burner with 30 million Btu heat input capacity, separator vessel, cyclone, venturi with separator, induced / forced draft fan, regenerative thermal oxidizer, induced draft fan, flue stack, pellet recycle bin, bucket elevators and a vibrating screen.

From the "wet cake storage bin", wet sludge is transferred to the "pin mixer" where the solid content is raised to 70% prior to delivery to the "triple-pass rotary dryer" from which the material solid content is raised typically to 93% or higher. The dryer is 11 feet in



diameter and mixes the solid material with hot air at temperatures ranging from 800 F to 900 F. The primary fuel is natural gas with the maximum rate about 29,412 cubic feet per hour. Kerosene and ultra low sulfur diesel fuel are secondary fuel alternatives. The solid material makes a triple pass through the rotary dryer with a retention period of 0.5 to 1.0 hours, depending on the flow rate.

The processed material and hot flue gases exit the rotary dryer into a "separator vessel" where the majority of the solid material is separated from the flue gas stream. The solid material from the vessel is transferred to the "vibrating screen," where product size material (2 - 3 millimeter in diameter) is segmented and sent to the "pellet storage load out facility" and oversized material is recycled through the "pellet recycle bin".

The flue gas exiting the separator vessel is directed to the "cyclone," where large particulate matter remaining in the gas stream is separated and combined with the solid material from the vessel. The flue gas leaving the cyclone is sent to a high-efficiency venturi scrubber / condenser-separator, where practically all of the particulate matter and ammonia gas are washed from the flue gas stream. The venturi scrubber provides both particulate emission control and odor control. Sulfuric acid is added to the scrubber liquor to enhance ammonia emission reduction for NO<sub>x</sub> control. (The solids component of the blow down from the scrubber recycle liquor is returned to the wet cake storage bin after dewatering.)

The flue gas from the venturi scrubber is split with about 50% by volume recirculated to "gas fired air heater," and the remaining 50% directed to the "regenerative thermal oxidizer" (RTO). The installation of "flue gas recirculation" [FGR] as part of Emission Unit U-00006 was completed on November 7, 2007, and is operational. The FGR must be operated at all times whenever sludge is being dried/processed in Emission Unit U-00006.

In the RTO, the gas temperature is increased to approximately 1600 degrees Fahrenheit for the destruction of volatile organic compounds [VOCs], and subsequently cooled by preheating the incoming flue gas [regeneration], prior to exiting to the atmosphere via the flue stack. The RTO utilizes two (2) burners with a total maximum fuel consumption of 10,000 cubic feet per hour of natural gas at rated capacity. The stack temperature of the flue gas exhaust is about 360 degrees F.

The RTO equipment for Emission Unit U-00004, U-00005, and U-00006 are connected by a manifold with isolation dampers such that each individual oxidizer can be operated with Emission Unit U-00004, and/or Emission Unit U-00005, and/or Emission Unit U-00006.

Building(s): 001

**Item 29.7:**

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



Emission Unit: U-00007

Emission Unit Description:

Emission Unit U-00007 is an air ventilation system for the Main Building, including the tipping floor and pelletization process area, with a 50,000 cubic feet per minute 3-stage sulfuric acid, hypochlorite and sodium hydroxide chemical odor scrubber. The air ventilation system with the chemical scrubber controls odors from the tipping area.

The odor control chemical scrubber is a three-stage design gas-liquid contact tower. Ventilated air from the tipping floor, and air from the pelletizing process area that is not utilized as combustion air, is directed to the scrubber via common duct and an induced/forced draft fan. The ventilated air enters the scrubber at the bottom and travels upwards through three-stage scrubbing treatment before exiting to the atmosphere via a stack located at the top of the scrubber. The first (bottom) stage removes ammonia through wet scrubbing with recirculation water with proper pH adjustment. The second stage removes reduced sulfur compounds with a recirculated sodium hypochlorite solution to provide for a high oxidation/reduction potential (ORP). Fresh reagent is directly added to this stage as needed. The third stage is a polishing washing operation, a once-through scrubbing with either a low flow caustic solution or only water during low concentration conditions that includes a mist elimination device to prevent water droplets from exiting the stack.

The installation of the odor control chemical scrubber as Emission Unit U-00007 was completed on August 16, 2006, and is operational.

Building(s): 001  
002

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

**Applicable Federal Requirement:6NYCRR 202-1.1**

**Item 30.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

NYOFCo shall meet the Permanent Total Enclosure criteria.

NYOFCo shall determine whether the facility meets the criteria of a Permanent Total Enclosure using 40 CFR 51, Appendix M, Method 204.

Reference Test Method: 40 CFR 51, Appendix M, Method 204

Monitoring Frequency: Once every three years

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



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

**Applicable Federal Requirement: 6NYCRR 202-1.1**

**Item 31.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

On an annual basis, NYOFCo shall perform a biosolids analysis of incoming sewage sludge for:

Chlorinated pesticides EPA Methods 8081/8082 (with additions):

PARAMETER	CAS No
Aldrin	309-00-2
a-BHC	319-84-6
b-BHC	3 1 9 - 85-7
d-BHC	319-86-8
g-BHC	58-89-9
Chlordane	57-74-9
p,p'-DDD	72-54-8
p,p'-DDE	72-55-9
p,p'-DDT	50-29-3
Dieldrin	60-57-1
Endosulfan I	959-98-8
Endosulfan II	33212-65-9
Endosulfan sulfate	1031-07-8
Endrin	72-20-8
Endrin aldehyde	7421-93-4
Heptachlor	76-44-8
Heptachlor epoxide	1024-57-3
Toxaphene	8001-35-2
PCB-1016	12674-11-2
PCB-1221	1104-28-2
PCB-1232	11141-16-5
PCB-1242	53469-21-9









CAS #	CONTAMINANT NAME
000084-74-2	1, 2-BenzenediCarboxylic Acid, Dibutyl Ester
007664-41-7	Ammonia
000056-55-3	Benzo (A) Anthracene
000050-32-8	Benzo(A)Pyrene
000117-81-7	Bis(2-Ethylhexyl) Phthalate
000630-08-0	Carbon Monoxide
000218-01-9	Chrysene
007440-47-3	Chromium
018540-29-9	Chromium VI
000117-84-0	Di-N-Octyl-Phthalate
000117-81-7	Di-Octyl-Phthalate
000084-74-2	Dibutyl Phthalate
007647-01-0	Hydrogen Chloride
007783-06-4	Hydrogen Sulfide
007439-92-1	Lead
007439-97-6	Mercury
000091-20-3	Naphthalene
007440-02-0	Nickel Metal And Insoluble Compounds
010102-44-0	Nitrogen Dioxide
0NY075-00-0	Total Particulate Matter
000198-55-0	Perylene
000085-01-8	Phenanthrene
0NY075-00-5	PM-10





Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Based on the stack test results of Condition #34, NYOFCo shall perform Air Guide-1 analysis to determine the ambient air impact of each of the contaminants, expressed as Annual Guideline Concentrations (AGCs) and Short-term Guideline Concentrations (SGCs) as specified in the DAR-1 AGC/SGC Tables dated September 10, 2007, or later edition.

Monitoring Frequency: Once every three years

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 36: Acceptable procedures  
Effective for entire length of Permit**

**Applicable Federal Requirement:6NYCRR 202-1.3**

**Item 36.1:**

Emission testing, sampling, and analytical determinations to ascertain compliance with this Subpart shall be conducted in accordance with test methods acceptable to the commissioner.

**Condition 37: Acceptable procedures - Stack test report submittal  
Effective for entire length of Permit**

**Applicable Federal Requirement:6NYCRR 202-1.3**

**Item 37.1:**

Emission test reports must be submitted in triplicate to the commissioner within 60 days after the completion of the tests, unless additional time is requested in writing.

**Condition 38: Alternate test methods  
Effective for entire length of Permit**

**Applicable Federal Requirement:6NYCRR 202-1.3**

**Item 38.1:**

Alternate emission test methods or deviations from acceptable test methods may be utilized if it is impractical to utilize the acceptable test methods or where no applicable test method is available, if prior acceptance of the proposed alternate method is granted by the commissioner.

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

**Applicable Federal Requirement:6NYCRR 212.4(a)**

**Item 39.1:**

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

Emission Unit: U-00001

Emission Point: EP001

Emission Unit: U-00002

Emission Point: EP002



Emission Unit: U-00003	Emission Point: EP003
Emission Unit: U-00004	Emission Point: EP004
Emission Unit: U-00005	Emission Point: EP005
Emission Unit: U-00006	Emission Point: EP006

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

**Item 39.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The Environmental Rating for Volatile Organic Compounds (VOC) was determined to be "A". Compliance with BACT is achieved when:

1. The total VOC emissions from all (6) RTOs does not exceed 9.57 pounds per hour, or,
2. The degree of air cleaning for VOC emitted from each of the six (6) RTOs is at least 96%.

See related Condition #53.

Parameter Monitored: VOC

Lower Permit Limit: 96 percent degree of air cleaning or greater

Reference Test Method: 40 CFR 60 App A, Methods 18 or 25A

Monitoring Frequency: Once every three years

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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

**Applicable Federal Requirement:6NYCRR 212.6(a)**

**Item 40.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00002	Emission Point: EP002
Emission Unit: U-00003	Emission Point: EP003
Emission Unit: U-00004	Emission Point: EP004
Emission Unit: U-00001	Emission Point: EP001
Emission Unit: U-00005	Emission Point: EP005



Emission Unit: U-00006

Emission Point: EP006

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 40.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

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 and the ventilation system, except only the emission of uncombined water.

NYOFCo operates a Continuous Opacity Monitoring System (COMS). NYOFCo shall notify the Department within 24 hours of any opacity reading greater than 20%. NYOFCO shall determine the root cause of the opacity excursion, make the necessary correction, and submit a report to the Department within 2 days.

Records of these observations, investigations and corrective actions shall be kept on-site for 5 years and made available for review.

Manufacturer Name/Model Number: Thermo Environmental Instruments Inc. Model 400B Transmissometer

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: CONTINUOUS

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 41: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 61.52(b), NESHAP Subpart E**

**Item 41.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-00001

Emission Point: EP001

Emission Unit: U-00002

Emission Point: EP002

Emission Unit: U-00003

Emission Point: EP003

Emission Unit: U-00004

Emission Point: EP004

Emission Unit: U-00005

Emission Point: EP005



Emission Unit: U-00006

Emission Point: EP006

Regulated Contaminant(s):

CAS No: 007439-97-6 MERCURY

**Item 41.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Total facility-wide emissions of mercury to the atmosphere shall not exceed 3,200 grams per 24-hour period.

Parameter Monitored: MERCURY

Upper Permit Limit: 3200 grams per day

Reference Test Method: 40 CFR 60 App. B, Method 101A

Monitoring Frequency: Once every three years

Averaging Method: 24 HOUR MAXIMUM

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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

**Condition 42: Emission Point Definition By Emission Unit  
Effective for entire length of Permit**

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

**Item 42.1:**

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

Emission Unit: U-00001

Emission Point: EP001

Height (ft.): 171

Diameter (in.): 30

NYTMN (km.): 4517.973 NYTME (km.): 593.379 Building: 001

**Item 42.2:**

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

Emission Unit: U-00002

Emission Point: EP002

Height (ft.): 171

Diameter (in.): 30

NYTMN (km.): 4517.973 NYTME (km.): 593.378 Building: 001

**Item 42.3:**

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

Emission Unit: U-00003



Emission Point: EP003  
Height (ft.): 171 Diameter (in.): 30  
NYTMN (km.): 4517.973 NYTME (km.): 593.378 Building: 001

**Item 42.4:**

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

Emission Unit: U-00004

Emission Point: EP004  
Height (ft.): 174 Diameter (in.): 24  
NYTMN (km.): 4517.973 NYTME (km.): 593.378 Building: 001

**Item 42.5:**

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

Emission Unit: U-00005

Emission Point: EP005  
Height (ft.): 174 Diameter (in.): 24  
NYTMN (km.): 4517.973 NYTME (km.): 593.378 Building: 001

**Item 42.6:**

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

Emission Unit: U-00006

Emission Point: EP006  
Height (ft.): 174 Diameter (in.): 24  
NYTMN (km.): 4517.973 NYTME (km.): 593.378 Building: 001

**Item 42.7:**

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

Emission Unit: U-00007

Emission Point: EP007  
Height (ft.): 81 Diameter (in.): 60  
NYTMN (km.): 4517.973 NYTME (km.): 593.378 Building: 002

**Condition 43: Process Definition By Emission Unit  
Effective for entire length of Permit**

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

**Item 43.1:**

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

Emission Unit: U-00001  
Process: PR1 Source Classification Code: 3-01-045-01

Process Description:

Process PR1 is the flow of the gas of drying train #1 beginning with cyclone #1 until exiting at RTO #1.



The drying process is accomplished with natural gas (primary fuel) or back up fuels (ultra-low sulfur diesel or kerosene) with air pollution control serving the dryer trains. The Emission Sources and air pollution control devices are as follows for dryer train 1 (Emission Unit U-00001):

1. Each train is equipped with a dryer to dry the sludge.
2. A cyclone then follows for particulate control.
3. A wet scrubber with acid feed then follows for additional particulate, ammonia and NOx control.
4. A regenerative thermal oxidizer (RTO) then follows for VOC control.

Emission Source/Control: RDRY1 - Combustion  
Design Capacity: 50 tons per day

Emission Source/Control: CYCL1 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: DRYR1 - Control  
Control Type: LOW NOx BURNER

Emission Source/Control: RTOX1 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: SCRB1 - Control  
Control Type: WET SCRUBBER, VENTURI SCRUBBER

**Item 43.2:**

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

Emission Unit: U-00002

Process: PR2

Source Classification Code: 3-01-045-01

Process Description:

Process PR2 is the flow of the gas of drying train #2 beginning with cyclone #2 until exiting at RTO #2.

The drying process is accomplished with natural gas (primary fuel) or back up fuels (ultra-low sulfur diesel or kerosene) with air pollution control serving the dryer trains. The Emission Sources and air pollution control devices are as follows for dryer train 2 (Emission Unit U-00002):

1. Each train is equipped with a dryer to dry the sludge.
2. A cyclone then follows for particulate control.
3. A wet scrubber with acid feed then follows for additional particulate, ammonia and NOx control.
4. A regenerative thermal oxidizer (RTO) then follows for VOC control.

Emission Source/Control: RDRY2 - Combustion  
Design Capacity: 50 tons per day



Emission Source/Control: CYCL2 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: DRYR2 - Control  
Control Type: LOW NOx BURNER

Emission Source/Control: RTOX2 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: SCR2 - Control  
Control Type: WET SCRUBBER, VENTURI SCRUBBER

**Item 43.3:**

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

Emission Unit: U-00003

Process: PR3

Source Classification Code: 3-01-045-01

Process Description:

Process PR3 is the flow of the gas of drying train #3 beginning with cyclone #3 until exiting at RTO #3.

The drying process is accomplished with natural gas (primary fuel) or back up fuels (ultra-low sulfur diesel or kerosene) with air pollution control serving the dryer trains. The Emission Sources and air pollution control devices are as follows for dryer train 3 (Emission Unit U-00003):

1. Each train is equipped with a dryer to dry the sludge.
2. A cyclone then follows for particulate control.
3. A wet scrubber with acid feed then follows for additional particulate, ammonia and NOx control.
4. A regenerative thermal oxidizer (RTO) then follows for VOC control.

Emission Source/Control: RDRY3 - Combustion  
Design Capacity: 50 tons per day

Emission Source/Control: CYCL3 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: DRYR3 - Control  
Control Type: LOW NOx BURNER

Emission Source/Control: RTOX3 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: SCR3 - Control  
Control Type: WET SCRUBBER, VENTURI SCRUBBER

**Item 43.4:**

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



Emission Unit: U-00004

Process: PR4

Source Classification Code: 3-01-045-01

Process Description:

Process PR4 is the air flow after the flue gas recirculation (FGR) from the sludge drying trains 4, and/or 5 and/or 6 to RTO Unit 4. The flue gas from the train is conveyed through an air pollution control train with its own individual vent. The individual vent is housed in a single stack (Emission Point 00004).

The drying process is accomplished with natural gas (primary fuel) or back up fuels (ultra low sulfur diesel or kerosene) with air pollution control serving the dryer trains. The Emission Sources and air pollution control devices are as follows for dryer train 4 (Emission Unit U-00004):

1. Each dryer train is equipped with a dryer using natural gas (back up fuel is ultra-low sulfur diesel or kerosene),
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 (Emission Control CYC04),
4. A wet scrubber with acid feed then follows for additional particulate, ammonia and NOx control (Emission Control SCR04),
5. A regenerative thermal oxidizer (RTO) then follows for VOC control (Emission Control RTOX4, or RTOX5, or RTOX6),
6. Emission Units U-00004, U-00005 and U-00006 are connected to a manifold with isolation dampers such that one, two or three of these three emission units may be routed to a single RTO (Emission Control RTOX4, or RTOX5, or RTOX6).

Emission Source/Control: RDRY4 - Combustion

Design Capacity: 50 tons per day

Emission Source/Control: CYCL4 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: DRYR4 - Control

Control Type: LOW NOx BURNER

Emission Source/Control: FGR04 - Control

Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: RTOX4 - Control

Control Type: THERMAL OXIDATION

Emission Source/Control: SCR04 - Control

Control Type: WET SCRUBBER, VENTURI SCRUBBER



**Item 43.5:**

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

Emission Unit: U-00005

Process: PR5

Source Classification Code: 3-01-045-01

Process Description:

Process PR5 is the air flow after the flue gas recirculation (FGR) from the sludge drying trains 4, and/or 5 and/or 6 to RTO Unit 5. The flue gas from the train is conveyed through an air pollution control train with its own individual vent. The individual vent is housed in a single stack (Emission Point 00005).

The drying process is accomplished with natural gas (primary fuel) or back up fuels (ultra low sulfur diesel or kerosene) with air pollution control serving the dryer trains. The Emission Sources and air pollution control devices are as follows for dryer train 5 (Emission Unit U-00005):

1. Each dryer train is equipped with a dryer using natural gas (back up fuel is ultra-low sulfur diesel or kerosene),
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 (Emission Control CYC05),
4. A wet scrubber with acid feed then follows for additional particulate, ammonia and NOx control (Emission Control SCR05),
5. A regenerative thermal oxidizer (RTO) then follows for VOC control (Emission Control RTOX4, or RTOX5, or RTOX6),
6. Emission Units U-00004, U-00005 and U-00006 will be connected to a manifold with isolation dampers such that one, two or three of these three emission units may be routed to a single RTO (Emission Control RTOX4, or RTOX5, or RTOX6).

Emission Source/Control: RDRY5 - Combustion

Design Capacity: 50 tons per day

Emission Source/Control: CYCL5 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: DRYR5 - Control

Control Type: LOW NOx BURNER

Emission Source/Control: FGR05 - Control

Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: RTOX5 - Control

Control Type: THERMAL OXIDATION



Emission Source/Control: SCRB5 - Control  
Control Type: WET SCRUBBER, VENTURI SCRUBBER

**Item 43.6:**

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

Emission Unit: U-00006

Process: PR6

Source Classification Code: 3-01-045-01

Process Description:

Process PR6 is the air flow after the flue gas recirculation (FGR) from the sludge drying trains 4, and/or 5 and/or 6 to RTO Unit 6. The flue gas from the train is conveyed through an air pollution control train with its own individual vent. The individual vent is housed in a single stack (Emission Point 00006).

The drying process is accomplished with natural gas (primary fuel) or back up fuels (ultra low sulfur diesel or kerosene) with air pollution control serving the dryer trains. The Emission Sources and air pollution control devices are as follows for dryer train 6 (Emission Unit U-00006):

1. Each dryer train is equipped with a dryer using natural gas (back up fuel is ultra-low sulfur diesel or kerosene),
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 (Emission Control CYC06),
4. A wet scrubber with acid feed then follows for additional particulate, ammonia and NOx control (Emission Control SCR06),
5. A regenerative thermal oxidizer (RTO) then follows for VOC control (Emission Control RTOX4, or RTOX5, or RTOX6),
6. Emission Units U-00004, U-00005 and U-00006 will be connected to a manifold with isolation dampers such that one, two or three of these three emission units may be routed to a single RTO (Emission Control RTOX4, or RTOX5, or RTOX6).

Emission Source/Control: RDRY6 - Combustion  
Design Capacity: 50 tons per day

Emission Source/Control: CYCL6 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: DRYR6 - Control  
Control Type: LOW NOx BURNER

Emission Source/Control: FGR06 - Control  
Control Type: FLUE GAS RECIRCULATION



Emission Source/Control: RTOX6 - Control  
Control Type: THERMAL OXIDATION

Emission Source/Control: SCRB6 - Control  
Control Type: WET SCRUBBER, VENTURI SCRUBBER

**Item 43.7:**

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

Emission Unit: U-00007

Process: ODR

Source Classification Code: 3-01-205-03

Process Description:

Air ventilated from the tipping area will be treated in a three-stage chemical scrubber with sodium hydroxide, sulfuric acid and sodium hypochlorite prior to being emitted into the atmosphere. The three-stage chemical scrubber consists of three stages: STAG1, STAG2, and STAG3. STAG1 is an Emission Control to control the ammonia emissions, STAG2 is an Emission Control for reduced sulfur compounds, and STAG3 is for polishing/washing.

Emission Source/Control: OXRDP - Control  
Control Type: CHEMICAL REDUCTION

Emission Source/Control: STAG1 - Control  
Control Type: AMMONIA SCRUBBING

Emission Source/Control: STAG2 - Control  
Control Type: CHEMICAL REDUCTION

Emission Source/Control: STAG3 - Control  
Control Type: CHEMICAL REDUCTION

Emission Source/Control: ODORS - Process  
Design Capacity: 50,000 cubic feet per minute



**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 44: Contaminant List  
Effective for entire length of Permit**

**Applicable State Requirement:ECL 19-0301**

**Item 44.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 007439-97-6

Name: MERCURY

CAS No: 007664-41-7

Name: AMMONIA

CAS No: 007783-06-4

Name: HYDROGEN SULFIDE





(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 46: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 201-1.10(b)**

**Item 46.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 46.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

NYOFCo will place into a public repository the following documents:

1. The odor response monitor's quarterly reports,
2. The triennial (once every three years) stack test reports, and
3. The current Department issued permits.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 47: Air pollution prohibited  
Effective for entire length of Permit**

**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.





1. receiving complaints from both English and Spanish speakers;
2. responding to each odor complaint within 30 minutes from the time a complaint is received by making an investigation at the location of the complaint unless the complainant describes an odor that cannot reasonably be potentially attributed to NYOFCo. However, if the investigator fails to respond to a complaint within 30 minutes, the reason for such failure must be documented and provided to DEC for assessment. In order to facilitate the 30 minute response time, the investigator must be located within reasonable transportation distance of the NYOFCo facility. The OMS must be designed to avoid the desensitization of the investigators to NYOFCo odors;
3. investigating each odor complaint within a one-mile radius of the facility within Bronx County; and
4. reporting the findings of an investigation to the Permittee within one hour of completing such investigation.

Within 24 hours of an odor complaint, the ORM or his representative shall provide a written report by e-mail to the DEC Regional Solid Waste Engineer, the DEC Regional Air Pollution Control Engineer, the NYCDEP Bureau of Waste Water Treatment, and the NYOFCo Facility Manager, detailing the outcome of the investigation. In addition, if the complainant's name and contact information is made available, the ORM or his representative shall mail a copy of the report of the investigation to the complainant within 24 hours of the complaint via U.S. mail or electronic mail if the complainant provides an e-mail address. The report shall include:

- (i) the location of the complainant,
- (ii) the exact time when the complaint was reported,
- (iii) the exact time when the investigator arrived at the area of the reported complaint, and
- (iv) the source and the reason for the odor complaint, if discovered.

The ORM or his representative must submit a quarterly report to the four parties noted above. The report must include a list of all odor complaints, the location where the alleged odor was detected, the wind direction, the wind speed at the time of the complaint, a description of the investigation of the complaint, and the outcome of the investigation for each complaint. The quarterly reports must be available in both English and Spanish. In addition, the ORM or his representative must provide an update at the regularly scheduled meetings of the Hunts Point Monitoring Committee summarizing the odor complaints received and responses to those complaints during the preceding month. All quarterly reports shall be placed in a community repository, approved by DEC, within 30 days of the end of each quarterly reporting period. In addition, Permittee shall place tri-annual stack test reports and copies of current permits issued by the Department to NYOFCo in this repository.





(a) "New York Organic Fertilizer Company: Plan for Controlling, Monitoring and Recording Odor Incidents," including all appendices and attachments except that for the period or periods in which the Odor Monitoring System (OMS) required by Condition #49 is implemented, the OMS shall be implemented in lieu of this Plan's community inspection provision (Odor Monitoring: Self-Monitoring: Independent Consultant Monitoring and Responding to Odor Complaints). All other provisions, including regarding regular maintenance of pollution control systems and monthly odor sampling from the inlet and outlet of the RTOs and Odor Scrubber remain in effect. Reports of the monthly odor sampling from the inlet and outlet of the RTOs and Odor Scrubber shall be provided to DEC in a timely manner.

(b) "New York Organic Fertilizer Company: CEM Validation Procedure," including all attachments.

REPORTS of the following shall be submitted to NYSDEC on the 1st and on the 15th of every month:

- (i) odor complaints received by NYOFCo,
- (ii) odor complaints investigated by NYOFCo, and
- (iii) corrective measures implemented by NYOFCo in response to the odor complaints.

The bi-monthly reports on odor complaints, investigations and corrective measures required under this Condition shall continue to be submitted during all periods in which the Odor Monitoring System (OMS) is not implemented.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: BIMONTHLY (CALENDAR)

Reports due 15 days after the reporting period.

Subsequent reports are due every 2 calendar month(s).

**Condition 51: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 211.2**

**Item 51.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 51.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

NYOFCo's tipping building and process building shall be enclosed and under negative pressure adequate to prevent the uncontrolled release of air from the tipping building and process building during all weather conditions. Negative pressure will be monitored via a differential pressure transmitter, or other technology acceptable to the Department, which will activate the sound of an alarm to alert





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

**Condition 53: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.4**

**Item 53.1:**

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

Emission Unit: U-00001	Emission Point: EP001
Emission Unit: U-00002	Emission Point: EP002
Emission Unit: U-00003	Emission Point: EP003
Emission Unit: U-00004	Emission Point: EP004
Emission Unit: U-00005	Emission Point: EP005
Emission Unit: U-00006	Emission Point: EP006
Regulated Contaminant(s):	
CAS No: 0NY998-00-0	VOC

**Item 53.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The Environmental Rating for Volatile Organic Compounds (VOC) was determined to be "A". Compliance with BACT is achieved when:

1. The total VOC emissions from all (6) RTOs does not exceed 9.57 pounds per hour, or,
2. The degree of air cleaning for VOC emitted from each of the six (6) RTOs is at least 96%.

See related Condition #39.

Parameter Monitored: VOC

Upper Permit Limit: 9.57 pounds per hour

Reference Test Method: 40 CFR 60 App A, Methods 18 or 25A

Monitoring Frequency: Once every three years

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 54: Compliance Demonstration**



**Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.4**

**Item 54.1:**

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

Emission Unit: U-00001	Emission Point: EP001
Emission Unit: U-00002	Emission Point: EP002
Emission Unit: U-00003	Emission Point: EP003
Emission Unit: U-00004	Emission Point: EP004
Emission Unit: U-00005	Emission Point: EP005
Emission Unit: U-00006	Emission Point: EP006

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

**Item 54.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The Environmental Rating for Hydrogen Sulfide (H2S) was determined to be "A". Compliance with BACT is achieved when:

1. The total Hydrogen Sulfide emissions from all (6) RTOs does not exceed 0.2475 pounds per hour, or,
2. The degree of air cleaning for Hydrogen Sulfide emitted from each of the six (6) RTOs is at least 96%.

See related Condition #58.

Parameter Monitored: HYDROGEN SULFIDE  
Lower Permit Limit: 96 percent degree of air cleaning or greater  
Reference Test Method: USEPA Method 16  
Monitoring Frequency: Once every three years  
Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 55: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.4**

**Item 55.1:**

The Compliance Demonstration activity will be performed for the facility:





Process: PR1	Emission Source: SCRB1
Emission Unit: U-00002 Process: PR2	Emission Point: EP002 Emission Source: CYCL2
Emission Unit: U-00002 Process: PR2	Emission Point: EP002 Emission Source: SCRB2
Emission Unit: U-00003 Process: PR3	Emission Point: EP003 Emission Source: CYCL3
Emission Unit: U-00003 Process: PR3	Emission Point: EP003 Emission Source: SCRB3
Emission Unit: U-00004 Process: PR4	Emission Point: EP004 Emission Source: CYCL4
Emission Unit: U-00004 Process: PR4	Emission Point: EP004 Emission Source: SCRB4
Emission Unit: U-00005 Process: PR5	Emission Point: EP005 Emission Source: CYCL5
Emission Unit: U-00005 Process: PR5	Emission Point: EP005 Emission Source: SCRB5
Emission Unit: U-00006 Process: PR6	Emission Point: EP006 Emission Source: CYCL6
Emission Unit: U-00006 Process: PR6	Emission Point: EP006 Emission Source: SCRB6

**Item 56.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The pressure drop of the gas flow across the wet venturi scrubber and cyclone in each of the six (6) dryer trains shall be a minimum of 18 inches of water. The pressure drop shall be continuously monitored and recorded.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 18 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 57: Compliance Demonstration**



**Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.4**

**Item 57.1:**

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

Emission Unit: U-00001 Process: PR1	Emission Point: EP001 Emission Source: RTOX1
Emission Unit: U-00002 Process: PR2	Emission Point: EP002 Emission Source: RTOX2
Emission Unit: U-00003 Process: PR3	Emission Point: EP003 Emission Source: RTOX3
Emission Unit: U-00004 Process: PR4	Emission Point: EP004 Emission Source: RTOX4
Emission Unit: U-00005 Process: PR5	Emission Point: EP005 Emission Source: RTOX5
Emission Unit: U-00006 Process: PR6	Emission Point: EP006 Emission Source: RTOX6

**Item 57.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

NYOFCo shall continuously monitor and record the temperature of the operating RTOs. The monitor shall automatically sound a warning signal when the temperature falls below 1600 degrees Fahrenheit. The process control shall cause the operation to automatically cease when the temperature falls below 1585 degrees Fahrenheit.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1585 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 58: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 58.1:**



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

Emission Unit: U-00001	Emission Point: EP001
Emission Unit: U-00002	Emission Point: EP002
Emission Unit: U-00003	Emission Point: EP003
Emission Unit: U-00004	Emission Point: EP004
Emission Unit: U-00005	Emission Point: EP005
Emission Unit: U-00006	Emission Point: EP006

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

**Item 58.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The Environmental Rating for Hydrogen Sulfide (H2S) was determined to be "A". Compliance with BACT is achieved when:

1. The total Hydrogen Sulfide emissions from all (6) RTOs does not exceed 0.2475 pounds per hour, or,
2. The degree of air cleaning for Hydrogen Sulfide emitted from each of the six (6) RTOs is at least 96%.

See related Condition #54.

Parameter Monitored: HYDROGEN SULFIDE  
Upper Permit Limit: 0.2475 pounds per hour  
Reference Test Method: USEPA Method 16  
Monitoring Frequency: Once every three years  
Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 59:      Compliance Demonstration  
                         Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.4(a)**

**Item 59.1:**

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

Emission Unit: U-00001	Emission Point: EP001
Emission Unit: U-00002	Emission Point: EP002



Emission Unit: U-00003	Emission Point: EP003
Emission Unit: U-00004	Emission Point: EP004
Emission Unit: U-00005	Emission Point: EP005
Emission Unit: U-00006	Emission Point: EP006
Regulated Contaminant(s):	
CAS No: 0NY075-00-0	PARTICULATES

**Item 59.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The Environmental Rating for Particulates was determined to be "A". Compliance with BACT is achieved when the emissions of Particulate Matter from each of the six (6) dryer trains do not exceed a concentration of 0.008 grains per dry standard cubic foot of undiluted exhaust gas corrected to 1% CO2.

Parameter Monitored: PARTICULATES

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

Reference Test Method: 40 CFR 60 App. A, Method 5

Monitoring Frequency: Once every three years

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 60: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 212.10**

**Item 60.1:**

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-00003	Emission Point: EP003
Emission Unit: U-00004	Emission Point: EP004
Emission Unit: U-00005	Emission Point: EP005
Emission Unit: U-00006	Emission Point: EP006
Emission Unit: U-00001	Emission Point: EP001
Emission Unit: U-00002	Emission Point: EP002

Regulated Contaminant(s):



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

**Item 60.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The total NOx emissions from all 6 RTOs shall not exceed 19.2 lbs/hr.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 19.2 pounds per hour

Reference Test Method: 40 CFR 60 App. A, Method 7E

Monitoring Frequency: Once every three years

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 61: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable State Requirement: 6NYCRR 225-1.8**

**Item 61.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 61.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility which purchases and fires coal and/or fuel oil shall compile and retain records of the following information:

- a. fuel analyses and data on the quantities of all residual and distillate oil and coal received, burned or sold;
- b. the names of all purchasers of all residual and distillate oil and coal sold;
- 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 analyses must contain, as a minimum, data on the sulfur content, specific gravity and heating value of any residual oil, distillate oil or coal received, burned or sold. Ash content shall also be included in the fuel analyses for any residual oil or coal received, burned or sold.

These records shall be retained for a minimum period of three years. If the facility is subject to Title V requirements the minimum record retention period shall be 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 fuel samples must be done in accordance with methods acceptable to the Department.



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

**Condition 62: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 257-1.4**

**Item 62.1:**  
The Compliance Demonstration activity will be performed for the Facility.

**Item 62.2:**  
Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS  
Monitoring Description:  
The sulfur content of the back-up fuel shall be less than 0.04% by weight. Compliance shall be determined by fuel sampling or by supplier certification.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: DIESEL OIL  
Parameter Monitored: SULFUR CONTENT  
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: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 3 calendar month(s).

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

**Condition 63: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 211.2**

**Item 63.1:**  
The Compliance Demonstration activity will be performed for:

Emission Unit: U-00007                      Emission Point: EP007  
Process: ODR                                      Emission Source: OXRDP

Regulated Contaminant(s):  
CAS No: 0NY501-00-0      REDUCED SULFUR COMPOUNDS  
CAS No: 0NY500-00-0      TOTAL REDUCED SULFUR



**Item 63.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to ensure that the second stage of the odor scrubber properly controls sulfur compounds, the Oxidation Reduction Potential (ORP) in the odor scrubber shall not fall below 550 millivolts (mV) except during periods of performing on-line maintenance of the first stage of the odor scrubber.

The regulated contaminants in the second stage of the odor scrubber are the Total Reduced Sulfur (which includes hydrogen sulfide, methyl mercaptan, dimethyl sulfide and dimethyl disulfide), and the Reduced Sulfur Compounds (which include hydrogen sulfide, carbonyl sulfide, carbon disulfide and diethyl disulfide).

Manufacturer Name/Model Number: Hach SC100 Controller

Parameter Monitored: OXIDATION REDUCTION POTENTIAL

Lower Permit Limit: 550 millivolts

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY  
TIME

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 64: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 211.2**

**Item 64.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00007

Emission Point: EP007

Process: ODR

Emission Source: STAG1

Regulated Contaminant(s):

CAS No: 007664-41-7 AMMONIA

**Item 64.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to ensure that the first stage of the odor scrubber properly controls ammonia, the pH of the first stage shall not exceed 5.0 except during periods of performing on-line maintenance of the first stage of the odor scrubber.



Parameter Monitored: PH  
Upper Permit Limit: 5.0 pH (STANDARD) units  
Monitoring Frequency: CONTINUOUS  
Averaging Method: 4 HOUR BLOCK AVERAGE (ARITHMETIC MEAN)  
Reporting Requirements: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 3 calendar month(s).

**Condition 65: Compliance Demonstration  
Effective for entire length of Permit**

**Applicable State Requirement:6NYCRR 211.2**

**Item 65.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00007                      Emission Point: EP007  
Process: ODR                                      Emission Source: STAG2

Regulated Contaminant(s):  
CAS No: 0NY501-00-0      REDUCED SULFUR COMPOUNDS  
CAS No: 0NY500-00-0      TOTAL REDUCED SULFUR

**Item 65.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

In order to ensure that the second stage of the odor scrubber properly controls sulfur compounds, the pH of the second stage shall not fall below 9.0 except during periods of performing on-line maintenance of the second stage of the odor scrubber.

The regulated contaminants in the second stage of the odor scrubber are the Total Reduced Sulfur (which includes hydrogen sulfide, methyl mercaptan, dimethyl sulfide and dimethyl disulfide), and the Reduced Sulfur Compounds (which include hydrogen sulfide, carbonyl sulfide, carbon disulfide and diethyl disulfide).

Parameter Monitored: PH  
Lower Permit Limit: 9.0 pH (STANDARD) units  
Monitoring Frequency: CONTINUOUS  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME  
Reporting Requirements: QUARTERLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 3 calendar month(s).

New York State Department of Environmental Conservation

Permit ID: 2-6007-00140/00011

Facility DEC ID: 2600700140

