

New York State Department of Environmental Conservation

DEC ID: 7034600032



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

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 2-6304-00268/00015
Mod 0 Effective Date: 10/19/2001 Expiration Date: 10/18/2006
Mod 1 Effective Date: 09/05/2002 Expiration Date: 10/18/2006

CONNECT TECHNOLOGIES INC
1701 NORTH STREET
ENDICOTT, NY 13760

Contact: PAUL A SPERANZA

CONNECT TECHNOLOGIES INC
1701 NORTH ST
ENDICOTT, NY 13760
(607) 755-6179

SCHNITZER EAST-QUEENS YARD
30-27 GREENPOINT AVENUE
LONG ISLAND CITY, NY 11101

Description:

PERMIT DESCRIPTION

**HUGO NEU SCHNITZER EAST - QUEENS YARD
DEC ID # 2-6304-00268/00015**

Hugo Neu Schnitzer East - Queens Yard, was previously owned and operated by Prolerized Schiabo Neu Company, was acquired on February 1, 1998 by Hugo Neu Schnitzer East headquartered in Jersey City, New Jersey. Hugo Neu Schnitzer East, located in Long Island City, New York, is a scrap metal processing/shredding facility that was originally constructed in the 1970's. This is a minor Title V modification for the permit that was issued on 10/19/2001. No new equipment is proposed. The modification involves the facility to increase the number of permitted operating hours for the Main Engine-Generator (Emission Unit 2-00002, Emission Point 0001) from 2700 to 3050 hours per year upon the issuance of this Title V modification. The modification impacts the maximum gallons of fuel (# 2 diesel oil) from 814,600 to 919,600 gallons annually and the tons of scrap metal processed from 450,000 to 500,000 tons annually. This modification results in no net NOx emissions increase and hence New Source Review, 6 NYCRR 231-2 is not applicable to this facility and therefore this modification

is not a modification.

Hugo Neu Schnitzer East - Queens Yard has performed the latest NOx RACT Emissions Stack Test on October 20, 2000 for the Main Generator (9,630 HP), on May 23, 2000 for the Cummins Generator (300

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KW) and on April 10, 2001 for the Caterpillar Generator (600 KW) in order to comply with this condition and with the NOx emissions from the three internal combustion engines. The result of the stack test indicates that the Main Generator and the Cummins Generator has met the 9.0 grams/brake hp-hr NOx emission limit (are in compliance). Actual Emissions from latest NOx RACT Emissions Stack Test (October 20, 2000) for the Main Generator averaged 87.3 lbs/hr of NOx (compared with 97.5 in previous stack tests) after reducing the NOx emission by modifying the Main Engine-Generator by retarding the ignition timing by 1.5 degrees in September 2000. Review of the stack test report dated April 20, 2001 for NOx emissions from the Caterpillar engine indicates that 8.2 gm/bhp-hr NOx emission limit complies with the standard of 9.0 gm/bhp-hr. The NOx emissions were generated while the Caterpillar engine operated between 90 to 95 percent of its capacity. Therefore, the Caterpillar engine must operate at a minimum of 90 % of its capacity. The result of the stack test indicates that the Caterpillar Generator has met the 9.0 grams/brake hp-hr NOx emission limit and therefore, it is in compliance. Based on the stack tests result, all of the three generator engines have been in compliance with the NOx RACT emission

February 15, 2001.

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 part of this permit.

Permit Administrator: JOHN F CRYAN
 DIVISION OF ENVIRONMENTAL PERMITS
 ONE HUNTERS POINT PLAZA, 47-40 21ST STREET
 LONG ISLAND CITY, NY 11101-5407

Authorized Signature: _____ Date: ___ / ___ / ____

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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

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

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.

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LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Relationship of this Permit to Other Department Orders and Determinations

Inspection by the Department

Applications for Permit Renewals and Modifications

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal-REGION 2

HEADQUARTERS



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

Item 2.1:

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

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

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3:

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



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

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

Expired by Mod No: 1

Item 3.1:

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

Item 3.2:

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

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

Item 1-2.1:

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

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

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

Expired by Mod No: 1

Item 4.1:

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

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



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

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

Item 5.1:

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



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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: ENDICOTT INTERCONNECT TECHNOLOGIES INC
1701 NORTH STREET
ENDICOTT, NY 13760

Contact: PAUL A SPERANZA
ENDICOTT INTERCONNECT TECHNOLOGIES INC
1701 NORTH ST
ENDICOTT, NY 13760
(607) 755-6179

Facility: HUGO NEU SCHNITZER EAST-QUEENS YARD
30-27 GREENPOINT AVENUE
LONG ISLAND CITY, NY 11101

Authorized Activity By Standard Industrial Classification Code:



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 False statement
- 26 Emission Unit Definition
 - 1-1 Recordkeeping and reporting of compliance monitoring
 - 1-2 Monitoring, Related Recordkeeping, and Reporting Requirements.
 - 1-3 Compliance Certification
 - 1-4 Compliance Certification
 - 1-5 Non Applicable requirements
- 31 Compliance Certification
- 32 Recordkeeping requirements
- 34 Compliance Certification
- 35 Applicability of Reasonably Available Control Technology
- 37 Compliance Certification
- 38 Compliance Certification
- 1-6 Accidental release provisions.

Emission Unit Level

- 40 Emission Point Definition By Emission Unit
- 41 Process Definition By Emission Unit
- 42 Compliance Certification (EU=1-00001,EP=00002,Proc=001,ES=00002)
- 43 Compliance Certification (EU=1-00001,EP=00004,Proc=001,ES=00004)
- 44 Compliance Certification (EU=1-00001,EP=00007,Proc=001,ES=00007)
- 45 Compliance Certification (EU=1-00001,EP=0000A,Proc=001,ES=0000A)
- 46 Compliance Certification (EU=1-00001,EP=0000F,Proc=001,ES=0000F)
- 47 Compliance Certification (EU=2-00002,EP=00001)
- 48 Compliance Certification (EU=2-00002,EP=00001)
- 1-7 Compliance Certification (EU=2-00002,EP=00001,Proc=002)
- 1-8 Compliance Certification (EU=2-00002,EP=00001,Proc=002,ES=00001)
- 51 Compliance Certification (EU=2-00002,EP=00001,Proc=002,ES=00001)
- 52 Compliance Certification (EU=2-00002,EP=00001,Proc=002,ES=00001)
- 53 Compliance Certification (EU=2-00002,EP=00001,Proc=002,ES=00001)
- 54 Compliance Certification (EU=2-00002,EP=00001,Proc=002,ES=00001)
- 1-9 Compliance Certification (EU=2-00002,EP=00001,Proc=002,ES=00001)
- 1-10 Compliance Certification (EU=2-00002,EP=00001,Proc=002,ES=00001)
- 56 Compliance Certification (EU=2-00002,EP=00001,Proc=002,ES=00001)
- 57 Compliance Certification (EU=2-00002,EP=0005A)
- 58 Compliance Certification (EU=2-00002,EP=0005A)
- 1-11 Compliance Certification (EU=2-00002,EP=0005A,Proc=002)
- 1-12 Compliance Certification (EU=2-00002,EP=0005A,Proc=002,ES=0005A)
- 61 Compliance Certification (EU=2-00002,EP=0005A,Proc=002,ES=0005A)
- 62 Compliance Certification (EU=2-00002,EP=0005A,Proc=002,ES=0005A)
- 63 Compliance Certification (EU=2-00002,EP=0005A,Proc=002,ES=0005A)
- 64 Compliance Certification (EU=2-00002,EP=0005A,Proc=002,ES=0005A)
- 1-13 Compliance Certification (EU=2-00002,EP=0005A,Proc=002,ES=0005A)



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- 1-14 Compliance Certification (EU=2-00002,EP=0005A,Proc=002,ES=0005A)
- 66 Compliance Certification (EU=2-00002,EP=0005A,Proc=002,ES=0005A)
- 67 Compliance Certification (EU=2-00002,EP=0005B)
- 68 Compliance Certification (EU=2-00002,EP=0005B)
- 69 Compliance Certification (EU=2-00002,EP=0005B)
- 1-15 Compliance Certification (EU=2-00002,EP=0005B,Proc=002)
- 1-16 Compliance Certification (EU=2-00002,EP=0005B,Proc=002,ES=0005B)
- 71 Compliance Certification (EU=2-00002,EP=0005B,Proc=002,ES=0005B)
- 72 Compliance Certification (EU=2-00002,EP=0005B,Proc=002,ES=0005B)
- 73 Compliance Certification (EU=2-00002,EP=0005B,Proc=002,ES=0005B)
- 74 Compliance Certification (EU=2-00002,EP=0005B,Proc=002,ES=0005B)
- 1-17 Compliance Certification (EU=2-00002,EP=0005B,Proc=002,ES=0005B)
- 76 Compliance Certification (EU=2-00002,EP=0005B,Proc=002,ES=0005B)

STATE ONLY ENFORCEABLE CONDITIONS

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- 1-18 Contaminant List
- 1-19 Unavoidable noncompliance and violations
- 80 Air pollution prohibited
- 5093 - SCRAP AND WASTE MATERIALS

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FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6NYCRR Part 200.5

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

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

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

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

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

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

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

Any person who owns or operates an air contamination

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

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

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

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

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

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

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

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

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

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

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

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the

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emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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requirements, regulations, or law.

- Item J: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)**
The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.
- Item K: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.
- Item L: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- Item M: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- Item N: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission**

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Requirements - 6 NYCRR Part 201-6.5(a)(3)

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

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

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

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

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

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

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

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

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

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

Upon presentation of credentials and other documents, as may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted

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facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

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

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

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

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

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

i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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

No permit revision will be required for operating changes that contravene an express permit term, provided that such

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changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

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

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

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

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Act;

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

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

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

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

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

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

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

Proceedings to reopen and issue Title V facility permits 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



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a shorter time period in the case of an emergency.

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

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

Item Z: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item AA: Open Fires - 6 NYCRR Part 215

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

Item BB: Permit Exclusion - ECL 19-0305

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

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

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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.

FEDERAL APPLICABLE REQUIREMENTS

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

Condition 1: False statement
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 200.3

Item 1.1:

No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

Condition 26: Emission Unit Definition
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 26.1(From Mod 1):

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

Emission Unit: 1-00001

Emission Unit Description:

THIS EMISSION UNIT INCLUDES SCRAP METAL SHREDDING AND METALS RECOVERY PROCESS. THIS EMISSION UNIT CONSISTS OF EMISSION POINTS 00002 (SHREDDER), 00004 (CYCLONE SEPARATOR FOR NON-FERROUS REMOVAL), 00007 (FERROUS PRODUCT CYCLONE), 0000A (Z-BOX METAL CYCLONE SEPARATOR) AND 0000F (MAGNETIC CYCLONE SEPARATOR - AIR SYSTEM). EMISSION POINT 00006 (STORAGE SILO) IS CONSIDERED TO BE EXEMPT ACCORDING TO 6NYCRR 201-3.2(c)(27).

Building(s): MET. SEP.

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SHREDDER

Item 26.2(From Mod 1):

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

Emission Unit: 2-00002

Emission Unit Description:

GENERATION OF ELECTRICITY VIA NUMBER 2 FUEL OIL-FIRED ENGINE-GENERATOR SETS FOR FACILITY OPERATION. THE FACILITY HAS THREE (3) UNITS: EMISSION POINTS 00001 (MAIN GENERATOR - 9630 HP DIESEL), 0005A (CATERPILLAR GENERATOR - 600 KW DIESEL) AND 0005B (CUMMINS GENERATOR - 300 KW DIESEL). THE FUEL OIL STORAGE TANK IS CONSIDERED TO BE EXEMPT ACCORDING TO 6NYCRR 201-3.2(c)(21).

Building(s): GENERATOR

Condition 1-1: Recordkeeping and reporting of compliance monitoring Effective between the dates of 09/05/2002 and 10/18/2006

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

Item 1-1.1:

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

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

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

Condition 1-2: Monitoring, Related Recordkeeping, and Reporting Requirements. Effective between the dates of 09/05/2002 and 10/18/2006

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

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Item 1-2.1:

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

Condition 1-3: Compliance Certification

Effective between the dates of 09/05/2002 and 10/18/2006

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

Item 1-3.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-3.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

(1) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in an applicable

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

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

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malfunctions or upsets.

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

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

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 1-4: Compliance Certification
Effective between the dates of 09/05/2002 and 10/18/2006

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

Item 1-4.1:

The Compliance Certification activity will be performed for the Facility.

Item 1-4.2:

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

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

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

The address for the RAPCE is as follows:

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

The address for the BCME is as follows:

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

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2002.
Subsequent reports are due on the same day each year

Condition 1-5: Non Applicable requirements
Effective between the dates of 09/05/2002 and 10/18/2006

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

Item 1-5.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

(From Mod 1) 6NYCRR 231-2.

Reason: Actual Emissions from latest NO_x RACT Emissions Stack Test (October 20, 2000) for the Main Generator averaged 87.3 lbs/hr of NO_x (compared with 97.5 in previous stack tests) after reducing the NO_x emission by modifying the Main Engine-Generator by retarding the ignition timing by 1.5 degrees in September 2000. An emission increase from 2700 operating hours to 3050 operating hours would yield actual NO_x emissions of:

3050 hours x 87.3 lbs/hr = 266,265 lbs/yr of
NO_x

Baseline NO_x = 267,523 lbs/yr. Proposed modification

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yields actual annual emissions of 266,265 lbs/yr. Since the Baseline (lesser of prior year actual or prior year allowable) is greater, there is no credible NOx emission increase, there is no net emissions increase and the modification qualifies as a "minor modification".

6NYCRR 231-2.2

Reason: MINOR PERMIT MODIFICATION: A minor permit modification is one that does not result in a net emissions increase. A net emissions increase is the project emission potential any every creditable emission increase. The project emission potential is the difference between prior actual annual emissions or prior allowable annual emissions, whichever is less, and the subsequent maximum annual potential of each such emission unit. A credible emission increase is any increase from a physical change in, or a change in the method of operation and is qualified as the difference between prior actual annual emissions, or prior allowable annual emissions, whichever is less and the subsequent maximum annual potential.

The following minor modifications to the permit are requested:

**Maximum Hours of Operation:
(Main Engine-Generator)**

Present: 2700 hours

Modification: 3050 hours

Maximum Gallons of Fuel Use:

Present: 814,600 gallons

Modification: 919,600 gallons

Maximum TPY Scrap Processed:

Present Permit: 450,000 tons

Modification: 500,000 tons

**Establish Baseline NOx Emissions for Main
Engine-Generator:**

(Prior actual annual emissions or prior allowable annual emissions, whichever is less)

1.A. 1999 Actual NOx Emissions:

(Based on stack testing)

2608 hours @ 96.7 lb/hour = 252,194 lbs

NOx

1.B. 2000 Actual NOx Emissions:

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(Based on October 20, 2000 Stack Testing -
reported in Annual Emissions Statement)
342,018 lbs NOx

2.A. 1999 Allowable NOx Emissions:
(Based on Stack Testing and 9.0 grams/BHP-hr
NOx RACT limit)
2700 hours @ 104.76 lbs/hr = 282,852 lbs
NOx

2. B. 2000 Allowable NOx Emissions:
(Based on October 20, 2000 Stack Testing and
9.0 grams/BHP-hr NOx RACT limit)
2700 hours @ 104.76 lbs/hr = 282,852 lbs
NOx

Therefore, Baseline NOx Emissions are: (1A) + (2B),
since the lower of actual or allowable is
required.

$252,194 + 282,852 = 535,046$ lbs NOx for the most recent 2
years, or 267,523 lbs per year of NOx.

Actual Emissions from latest NOx RACT Emissions Stack Test
(October 20, 2000) for the Main Generator averaged 87.3
lbs/hr of NOx after reducing the NOx emission by modifying
the Main Engine-Generator by retarding the ignition timing
by 1.5 degrees in September 2000. An emission increase
from 2700 operating hours to 3050 operating hours would
yield actual NOx emissions of:

$3050 \text{ hours} \times 87.3 \text{ lbs/hr} = 266,265$ lbs/yr of
NOx

Baseline NOx = 267,523 lbs/yr. Proposed modification
yields actual annual emissions of 266,265 lbs/yr. Since
the Baseline (lesser of prior year actual or prior year
allowable) is greater, there is no credible NOx emission
increase, there is no net emissions increase and the
modification qualifies as a "minor modification".

Condition 31: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 31.1:



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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:

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

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 32: Recordkeeping requirements
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 32.1:

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

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

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

Condition 34: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 34.1:

The Compliance Certification activity will be performed for the Facility.

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The maintenance procedure applicable to this permit for compliance with the opacity requirements under section 212.6(a) will include the following:



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1. If visible emissions above those that are normal and in compliance with section 212.6(a) are detected (this may be zero percent opacity for many or all stacks), the facility owner shall determine the cause immediately and make the necessary correction. The facility owner and/or operator will observe all emission points or other sources of air pollution daily during daylight hours to monitor for unusual opacity conditions. The records of these observations will be recorded in a bound log book at the facility and shall be available for inspection by Department representatives upon request. Records will be maintained for a period of at least five years.

2. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the facility owner will conduct a Method 9 assessment to determine the degree of opacity.

3. If the opacity is determined to exceed the limits of section 212.6(a), the facility will be determined to be in violation, will remedy the problem, and will contact the Department. The provisions of Part 201-1.4 shall apply.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 22)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 35: Applicability of Reasonably Available Control Technology Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 35.1:

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

Condition 37: Compliance Certification Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 225-1.2(a)(2)

Item 37.1:

The Compliance Certification activity will be performed for the Facility.

Item 37.2:

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Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person shall sell, offer for sale, purchase or use any distillate oil which has a sulfur content greater than the limit presented below. A log of the sulfur content in oil per delivery must be maintained on site for a minimum of five years after the date of the last entry.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.2 percent by weight

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 38: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 38.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

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

Item 38.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

TO COMPLY WITH 6NYCRR 227-2.4(f)(2), THE FACILITY WILL MAINTAIN DAILY RECORDS WHICH SHOULD INCLUDE:

1. HOURS OF OPERATION PER DAY BY EACH ENGINE-GENERATOR
2. GALLONS OF NUMBER 2 DIESEL FUEL BURNED BY EACH ENGINE-GENERATOR
3. AMOUNT OF SCRAP MATERIALS PROCESSED IN TONS
4. HOURS OF FACILITY OPERATION

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5. GALLONS OF WATER USED FOR DUST SUPPRESSION IN THE SHREDDER

AN EMISSION COMPLIANCE EVALUATION OR STACK TESTING WAS CONDUCTED ON EACH GENERATOR TO ESTABLISH THAT THE UNITS ARE IN COMPLIANCE WITH NYS DEC NOX RACT RULES AND EMISSION LIMIT, 6NYCRR 227-2. THE MAIN GENERATOR AT THIS FACILITY, WHOSE CAPACITY IS 9,630 HORSEPOWER WAS TESTED ON OCTOBER 20, 2000. THE CUMMINS AUXILIARY ENGINE, WHOSE CAPACITY IS 300 KW WAS TESTED ON MAY 23, 2000. THE CATERPILLAR GENERATOR, WHOSE CAPACITY IS 600 KW WAS TESTED ON APRIL 10, 2001. THE RESULT OF THE STACK TEST INDICATE THAT THE MAIN GENERATOR AND THE CUMMINS GENERATOR ARE IN COMPLIANCE WITH THE STANDARD OF 9.0 GM/BHP-HR NO_x EMISSION LIMIT. THE CATERPILLAR GENERATOR GENERATED 8.2 GM/BHP-HR NO_x EMISSION WHICH COMPLIES WITH THE STANDARD OF 9.0 GM/BHP-HR NO_x EMISSION LIMIT, BUT THIS WAS ACHIEVED WHILE OPERATING THE CATERPILLAR ENGINE BETWEEN 90 AND 95 PERCENT OF ITS CAPACITY.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: SCRAP

Manufacturer Name/Model Number: DIESEL INTERNAL COMBUSTION ENGINE

Upper Permit Limit: 174 tons per hour

Reference Test Method: Method 7, 7E or 19

Monitoring Frequency: HOURLY

Averaging Method: ARITHMETIC MEAN

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

**Condition 1-6: Accidental release provisions.
Effective between the dates of 09/05/2002 and 10/18/2006**

Applicable Federal Requirement: 40CFR 68.

Item 1-6.1:

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



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

USEPA Region 2
 Air Compliance Branch
 290 Broadway
 New York, NY 10007-1866
 ATTN: Accidental Release Program contact

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

Condition 40: Emission Point Definition By Emission Unit
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 40.1(From Mod 1):

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

Emission Unit: 2-00002			
Emission Point: 00001			
Height (ft.): 55	Diameter (in.): 28		
NYTMN (km.): 4509.8	NYTME (km.): 589.6	Building: GENERATOR	
Emission Point: 0005A			
Height (ft.): 41	Diameter (in.): 12		
NYTMN (km.): 4509.8	NYTME (km.): 589.6	Building: GENERATOR	
Emission Point: 0005B			
Height (ft.): 45	Diameter (in.): 8		
NYTMN (km.): 4509.8	NYTME (km.): 589.6	Building: GENERATOR	

Item 40.2(From Mod 0):

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

Emission Unit: 1-00001



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Emission Point: 00002
Height (ft.): 32 Diameter (in.): 57
NYTMN (km.): 4509.8 NYTME (km.): 589.6 Building: SHREDDER

Emission Point: 00004
Height (ft.): 50 Diameter (in.): 38
NYTMN (km.): 4509.8 NYTME (km.): 589.6 Building: SHREDDER

Emission Point: 00007
Height (ft.): 49 Diameter (in.): 38
NYTMN (km.): 4509.8 NYTME (km.): 589.6 Building: SHREDDER

Emission Point: 0000A
Height (ft.): 27 Diameter (in.): 39
NYTMN (km.): 4509.8 NYTME (km.): 589.6 Building: MET. SEP.

Emission Point: 0000F
Height (ft.): 44 Diameter (in.): 44
NYTMN (km.): 4509.8 NYTME (km.): 589.6 Building: SHREDDER

**Condition 41: Process Definition By Emission Unit
Effective between the dates of 10/19/2001 and 10/18/2006**

Applicable Federal Requirement: 6NYCRR 201-6.

Item 41.1(From Mod 1):

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

Emission Unit: 1-00001
Process: 001 Source Classification Code: 3-14-011-01
Process Description:

THE SCRAP METAL SHREDDING AND METALS RECOVERY PROCESS CONSIST OF A HAMMERMILL SHREDDER, CYCLONE SEPARATOR FOR RECOVERY AND CLEANING OF NON-FERROUS METALS, TWO (2) CYCLONE SEPARATORS FOR METALS RECOVERY AND CLEANING AND AN AIR CLASSIFICATION SYSTEM FOR FINAL MAGNETIC METALS QUALITY CONTROL. AS A RESULT OF THE TITLE V MODIFICATION (INCREASING THE HOURS OF OPERATION OF THE MAIN ENGINE-GENERATOR IN EMISSION UNIT 2-00002 & EMISSION POINT 0001 FROM 2700 to 3050 HOURS PER YEAR. ALL UNITS WITHIN THE PROCESS OPERATE AT THE SAME TIME. THE QUANTITY OF TONS OF SCRAP PROCESSED PER YEAR IS TO INCREASE FROM 450,000 to 500,000 AND THE AVERAGE HOURS OF OPERATION PER DAY IS TO INCREASE FROM 9 TO 10.

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Emission Source/Control: 00003 - Control
Control Type: DUST SUPPRESSION BY WATER SPRAY

Emission Source/Control: 00002 - Process
Design Capacity: 174 tons per hour

Emission Source/Control: 00004 - Process
Design Capacity: 37,000 cubic feet per minute

Emission Source/Control: 00007 - Process
Design Capacity: 42,000 cubic feet per minute

Emission Source/Control: 0000A - Process
Design Capacity: 9,000 cubic feet per minute

Emission Source/Control: 0000F - Process
Design Capacity: 44,000 cubic feet per minute

Item 41.2(From Mod 1):

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

Emission Unit: 2-00002

Process: 002

Source Classification Code: 2-03-001-01

Process Description:

NUMBER 2 DIESEL FUEL FIRED IN THREE (3) ENGINE-GENERATOR SETS. A TOTAL OF THREE (3) ENGINE-GENERATOR UNITS HAVE BEEN INSTALLED. EACH ENGINE-GENERATOR UNIT OPERATES AT SEPARATE TIMES, DEPENDING ON THE REQUIREMENT FOR ON-SITE ELECTRICITY.

EMISSION POINT 00001 IN EMISSION UNIT 2-00002 IS FOR THE MAIN ENGINE-GENERATOR (9630 HP DIESEL). AS A RESULT OF THE TITLE V MODIFICATION, THE NUMBER OF HOURS OF OPERATION OF THE MAIN ENGINE-GENERATOR WILL INCREASE FROM 2700 HOURS/YEAR to 3050 HOURS/YEAR. EMISSION POINT 0005A IS FOR THE CATERPILLAR GENERATOR (600 KW DIESEL) WHICH OPERATES A MAXIMUM OF 3750 HOURS/YEAR. EMISSION POINT 0005B IS FOR THE CUMMINS GENERATOR (300 KW DIESEL) WHICH OPERATES A MAXIMUM OF 4500 HOURS/YEAR.

AS A RESULT OF THE TITLE V MODIFICATION,

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THE FACILITY WILL INCREASE IT USE OF NUMBER
2 FUEL OIL FROM ABOUT 908,000 TO 1,013,000
GALLONS /YEAR FOR OPERATING THE THREE (3)
ENGINE-GENERATOR SETS.

Emission Source/Control: 00001 - Combustion
Design Capacity: 9,630 horsepower (electric)

Emission Source/Control: 0005A - Combustion
Design Capacity: 600 kilowatts

Emission Source/Control: 0005B - Combustion
Design Capacity: 300 kilowatts

Condition 42: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-00001 Emission Point: 00002
Process: 001 Emission Source: 00002

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

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than
0.050 grains of particulates per cubic foot of exhaust
gas, expressed at standard conditions on a dry gas basis.
Compliance testing will be conducted at the discretion of
the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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The initial report is due 1/30/2002.

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

Condition 43: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-00001 Emission Point: 00004
Process: 001 Emission Source: 00004

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

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

Condition 44: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 44.1:

The Compliance Certification activity will be performed for:



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Emission Unit: 1-00001 Emission Point: 00007
Process: 001 Emission Source: 00007

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

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

Condition 45: Compliance Certification

Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-00001 Emission Point: 0000A
Process: 001 Emission Source: 0000A

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

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:



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Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

Condition 46: Compliance Certification

Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-00001 Emission Point: 0000F

Process: 001 Emission Source: 0000F

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION



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Facility DEC ID: 7034600032

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

Condition 47: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-1.3

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operators of oil-fired internal combustion engines which are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

1) Observe the stack for each internal combustion engine which is operating on oil once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days firing oil (the firing of other fuels in between days of firing oil

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does not count as an interruption in the consecutive days of firing oil), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence.

The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 48: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 48.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity (on a six minute block period) except for one six minute block period per

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hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

Operators of air contamination sources that are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

1) Observe the stack(s) or vent(s) once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days, then the Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

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Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Method 9
Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2002.
Subsequent reports are due every 6 calendar month(s).

Condition 1-7: Compliance Certification
Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227.2(b)(1)

Item 1-7.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001
Process: 002

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

Item 1-7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

Particulate emission limit for a stationary combustion installation firing oil. The owner or operator shall complete the following once per term of this permit:

- 1) submit, to the Department, an acceptable protocol for the testing of particulate emission limit cited in this condition,
- 2) perform a stack test, based upon the approved test protocol, to determine compliance with the particulate emission limit cited in this condition, and
- 3) all records shall be maintained at the facility for a minimum of five years.

Manufacturer Name/Model Number: MAIN GENERATOR - 9630 HP Diesel Engine Generator
Parameter Monitored: PARTICULATES



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Upper Permit Limit: 0.10 pounds per million Btus
Reference Test Method: Method 5
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 1-8: Compliance Certification
Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.

Item 1-8.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001
Process: 002 Emission Source: 00001

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

Item 1-8.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An emission compliance evaluation or stack testing was conducted on each generator (Main, Caterpillar & Cummins) to establish that the units are in compliance with NYSDEC NOx RACT rules and emission limit, 6 NYCRR 227-2.

Hugo Neu Schnitzer East - Queens Yard has performed a NOx RACT Emissions Stack test on October 20, 2000 for the Main Generator (9,630 HP Diesel) in order to comply with this condition and with the standard of 9.0 gm/bhp-hr NOx emission limit from the Main Generator. The result of the stack test indicates that the Main Generator has met the 9.0 grams/brake hp-hr NOx emission limit and therefore, it is in compliance.

Manufacturer Name/Model Number: MAIN GENERATOR - 9,630 HP DIESEL

Reference Test Method: Method 7, 7E or 19

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)



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Reports due 30 days after the reporting period.
The initial report is due 10/30/2002.
Subsequent reports are due every 3 calendar month(s).

Condition 51: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001
Process: 002 Emission Source: 00001

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

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

NOx emission limit for a lean burn internal combustion engine which fires other or multiple fuels. Stack testing will be required in order to demonstrate compliance with the regulatory standard.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 9.0 grams per brake horsepower-hour

Reference Test Method: App A, M 7, 7E or 19

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 52: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001
Process: 002 Emission Source: 00001

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

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Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To ensure that the unit runs at optimum conditions and stays in compliance with the NO_x RACT emission limit, periodic maintenance will be performed in accordance with manufacturer's specifications. These specific procedures are outlined in the manufacturer's specification manual for the unit. Other components of the periodic maintenance program for the unit include those actions necessitated by the results of monitoring the following data: diagnostic data obtained after a set number of operating hours, engine oil analysis, and fuel consumption versus power output of the unit.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 53: Compliance Certification

Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.4(f)(2)(ii)

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001
Process: 002 Emission Source: 00001

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

Item 53.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

EFFECTIVE MAY 31, 1995, ANY OWNER OR OPERATOR OF A STATIONARY INTERNAL COMBUSTION ENGINE OF 225 HORSEPOWER OR LARGER IN THE SEVERE NONATTAINMENT AREA, WHICH PROVIDES PRIMARY POWER OR IS USED FOR PEAK SHAVING GENERATION, MUST COMPLY WITH THE FOLLOWING EMISSION LIMIT FOR

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LEAN BURN ENGINES:

(I) 3.0 GRAMS PER BRAKE
HORSEPOWER-HOUR FOR GAS ONLY FIRED UNITS;
OR

(II) 9.0 GRAMS PER BRAKE
HORSEPOWER-HOUR FOR UNITS FIRING OTHER
FUELS.

COMPLIANCE WITH THESE EMISSION LIMITS
SHALL BE DETERMINED WITH A ONE HOUR
AVERAGE IN ACCORDANCE WITH SECTION
227-2.6(a)(7) OF THIS SUBPART UNLESS THE
OWNER/OPERATOR OPTS TO UTILIZE CEMS UNDER
THE PROVISIONS OF SECTION 227-2.6(a)(2)
OF THIS SUBPART. IF CEMS ARE UTILIZED,
THE REQUIREMENTS OF SECTION 227-2.6(b)
APPLY, INCLUDING THE USE OF A 24 HOUR
AVERAGING PERIOD.

Manufacturer Name/Model Number: MAIN GENERATOR - 9630 HP DIESEL
Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 9.0 grams per brake horsepower-hour
Reference Test Method: MT& 40 CFR 60 APP A
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 54: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(a)(2)

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001
Process: 002 Emission Source: 00001

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

Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
The owner/operator of internal combustion engines may opt



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to employ a continuous emissions monitoring system (CEMS), or equivalent, in lieu of the monitoring requirements to perform initial compliance stack tests as described in subdivision (c) of this section. Those internal combustion engines which opt to monitor emissions with a CEMS or equivalent shall follow the requirements of subdivision (b) of this section to demonstrate compliance, including a 24 hour daily arithmetic average NOx emission rate.

Manufacturer Name/Model Number: CEMS

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 9.0 grams per brake horsepower-hour

Reference Test Method: CEMS

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 24 HOUR DAILY AVERAGE (ARITHMETIC MEAN)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-9: Compliance Certification

Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(a)(7)

Item 1-9.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001

Process: 002 Emission Source: 00001

Regulated Contaminant(s):

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

Item 1-9.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NOx emissions to demonstrate compliance with Subpart 2.6(a).

As a result of the Title V modification, the Main Generator - 9630 HP Diesel, Emission Point 00001 has the potential to operate up to 3,050 hours per year (an increase from 2700 hours per year). The number 2 diesel fuel usage for the Main generator will increase from



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814,600 to 919,600 gallons per year. And the number 2 diesel fuel usage for the facility will increase from 908,000 to 1,013,000 gallons per year. The average fuel usage is 301.5 gallons per hour.

The Caterpillar Generator - 600 KW Diesel, Emission Point 0005A has the potential to operate up to 3,750 hours per year. The average fuel usage is 12.3 gallons per hour.

The Cummins Generator - 300 KW Diesel, Emission Point 0005B has the potential to operate up to 4,500 hours per year. The average fuel usage is 10.5 gallons per hour.

Number 2 Diesel		
Fuel Usage		
	Emission	Max Annual
1997 Annual		
Point	(gallons)	(gallons)
Main Generator 571,318	00001	919,600
Caterpillar Generator 43,675	0005A	46,100
Cummins Generator 25,773	0005B	47,300

Total Emission Unit 2-00002 1,013,000 gallons
640,766 gallons

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NOx emissions to demonstrate compliance with Subpart 2.6(a). The purpose of the stack test program is to establish emission levels for the three engine generators to compare to the established emissions limits set forth in 6 NYCRR 227-2. The New York State Department of Environmental Conservation (NYSDEC) sets these emissions limits as part of the NOx RACT rules. Hugo Neu Schnitzer East - Queens Yard has performed the latest NOx RACT Emissions Stack

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Test on October 20, 2000 for the Main Generator (9,630 HP), on May 23, 2000 for the Cummins Generator (300 KW) and on April 10, 2001 for the Caterpillar Generator (600 KW) in order to comply with this condition and with the NOx emissions from the three internal combustion engines. The result of the stack test indicates that the Main Generator and the Cummins Generator has met the 9.0 grams/brake hp-hr NOx emission limit (are in compliance). Actual Emissions from latest NOx RACT Emissions Stack Test (October 20, 2000) for the Main Generator averaged 87.3 lbs/hr of NOx (compared with 97.5 in previous stack tests) after reducing the NOx emission by modifying the Main Engine-Generator by retarding the ignition timing by 1.5 degrees in September 2000. Modifications of the Caterpillar engine were completed on February 15, 2001 and included valve adjustments and retarding the injection timing by 5.5 degrees. The Caterpillar Generator generated 8.2 gm/bhp-hr NOx emission which complies with the standard of 9.0 gm/bhp-hr NOx emission limit, but this was achieved while operating the Caterpillar engine between 90 and 95 percent of its capacity. The test program consisted of using USEPA test methods to measure emissions from the Caterpillar generator exhaust stack for nitrogen oxides (NOx as NO₂), carbon dioxide (CO₂), and oxygen (O₂). The evaluation was conducted while the generator operated between 90% to 95% of its capacity.

In order for the Caterpillar Generator to meet the 9.0 grams/brake hp-hr NOx emission limit, it must operate at a minimum of 90 % of its capacity. Review of stack test report dated 4/20/2001 for NOx emissions from the Caterpillar engine indicates that 8.2 gm/bhp-hr which complies with the standard of 9.0 gm/bhp-hr. The NOx emissions were generated while the Caterpillar engine operated between 90 to 95 percent of its capacity. Based on the stack tests result, all of the three internal combustion engines have been in compliance with the NOx RACT emissions limit since February 15, 2001.

Manufacturer Name/Model Number: MAIN GENERATOR - 9,630 HP DIESEL
Upper Permit Limit: 9.0 grams per brake horsepower-hour
Reference Test Method: App A, M 7, 7E or 19
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



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Condition 1-10: Compliance Certification

Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(a)(7)

Item 1-10.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001
Process: 002 Emission Source: 00001

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

Item 1-10.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

On a daily basis, the facility will keep records
of:

1. The number 2 fuel usage for each generator in gallons per day and
2. The hours of operation for each generator in hours per day.

Records will be maintained for five years at the facility.

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NO_x emissions to demonstrate compliance with Subpart 2.6(a). Hugo Neu Schnitzer East-Queens Yard has performed the latest NO_x RACT Emissions Stack Test on October 20, 2000 for the Main Generator, on May 23, 2000 for the Cummings Generator and on April 10, 2001 for the Caterpillar Generator in order to comply with this condition and with the NO_x emissions from the three internal combustion engines.

The purpose of the stack test program is to establish emission levels for the three engine generators to compare to the established emissions limits set forth in 6 NYCRR 227-2. The New York State Department of Environmental Conservation (NYSDEC) sets these emissions limits as part of the NO_x RACT rules. The Main Generator at this

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facility, whose capacity is 9,630 horsepower was tested on October 20, 2000, and the Cummins auxiliary engine (300-kilowatt) was tested on May 23, 2000. Both engines were found to comply with these emissions limits. The result of the stack test indicates that the Main Generator and the Cummins Generator are in compliance with the standard of 9.0 gm/bhp-hr NO_x emission limit. The Caterpillar Generator at this facility was tested on April 10, 2001. Modifications of the Caterpillar engine were completed on February 15, 2001 and included valve adjustments and retarding the injection timing by 5.5 degrees. The Caterpillar Generator generated 8.2 gm/bhp-hr NO_x emission which complies with the standard of 9.0 gm/bhp-hr NO_x emission limit, but this was achieved while operating the Caterpillar engine between 90 and 95 percent of its capacity. The test program consisted of using USEPA test methods to measure emissions from the Caterpillar generator exhaust stack for nitrogen oxides (NO_x as NO₂), carbon dioxide (CO₂), and oxygen (O₂). The evaluation was conducted while the generator operated between 90% to 95% of its capacity.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: NUMBER 2 OIL

Manufacturer Name/Model Number: MAIN GENERATOR - 9630 HP DIESEL

Upper Permit Limit: 919,600 gallons per year

Reference Test Method: Method 7, 7E or 19

Monitoring Frequency: DAILY

Averaging Method: ANNUAL MAXIMUM ROLLED DAILY

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2002.

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

Condition 56: Compliance Certification

Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(c)

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 00001

Process: 002 Emission Source: 00001

Regulated Contaminant(s):

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

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Item 56.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NO_x emissions to demonstrate compliance with Subpart 2.6(a).

Stack Test Requirements: The owner/operator of those facilities required to stack test under subdivision (a) of this section shall:

1. submit compliance test protocol to the department for approval at least 90 days prior to emission testing. The conditions of the testing and the locations of the sampling devices must be acceptable to the department; and

2. utilize procedures set forth in 40 CFR part 60, Appendix A or any other method acceptable to the department and EPA for determining compliance with the appropriate NO_x limit in section 227-2.4 of this Subpart, and shall follow the procedures set forth in Part 202 of this Title.

For internal combustion engines, utilize Method 7, 7E, or 19 from 40 CFR part 60, Appendix A or another reference method approved by the department.

Hugo Neu Schnitzer East - Queens Yard has performed a NO_x RACT Emissions Stack Test on October 20, 2000 for the Main Generator (9,630 HP), on May 23, 2000 for the Cummins Generator (300 KW) and on April 10, 2001 for the Caterpillar Generator (600 KW) in order to comply with this condition and with the NO_x emissions from the three internal combustion engines. The result of the stack test indicates that the Main Generator and the Cummins Generator have met the 9.0 grams/brake hp-hr NO_x emission limit (are in compliance). In order for the Caterpillar Generator to meet the 9.0 grams/brake hp-hr NO_x emission limit, it must operate at a minimum of 90 % of its capacity. Review of stack test report dated April 20, 2001 for NO_x emissions from the Caterpillar engine indicates that 8.2 gm/bhp-hr complies with the standard of 9.0 gm/bhp-hr. The NO_x emissions were generated while the Caterpillar engine operated between 90 to 95 percent of



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its capacity. Based on the stack test results, all of three internal combustion engines have been in compliance with the NOx RACT emissions limits since February 15, 2001.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 9.0 grams per brake horsepower-hour

Reference Test Method: METHOD 7, 7E, or 19

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 57: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-1.3

Item 57.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005A

Item 57.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operators of oil-fired internal combustion engines which are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

1) Observe the stack for each internal combustion engine which is operating on oil once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- weather condition
- was a plume observed?



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This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days firing oil (the firing of other fuels in between days of firing oil does not count as an interruption in the consecutive days of firing oil), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 58: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005A

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 58.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity (on a six minute block period) except for one six minute block period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

Operators of air contamination sources that are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

- 1) Observe the stack(s) or vent(s) once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).
- 2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:
 - weather condition
 - was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days, then the Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a

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distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

Condition 1-11: Compliance Certification

Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227.2(b)(1)

Item 1-11.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005A
Process: 002

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-11.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emission limit for a stationary combustion installation firing oil. The owner or operator shall complete the following once per term of this permit:

- 1) submit, to the Department, an acceptable protocol for the testing of particulate emission limit cited in this condition,
- 2) perform a stack test, based upon the approved test protocol, to determine compliance with the particulate emission limit cited in this condition, and

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3) all records shall be maintained at the facility for a minimum of five years.

Manufacturer Name/Model Number: CATERPILLAR GENERATOR - 600 KW Diesel Generator

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Condition 1-12: Compliance Certification

Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.

Item 1-12.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005A
Process: 002 Emission Source: 0005A

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

Item 1-12.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An emission compliance evaluation or stack testing was conducted on each generator (Main, Caterpillar & Cummins) to establish that the units are in compliance with NYSDEC NOx RACT rules and emission limit, 6 NYCRR 227-2.

Modifications of the Caterpillar Generator were completed on February 15, 2001 and included valve adjustments and retarding the injection timing by 5.5 degrees. Hugo Neu Schnitzer East - Queens Yard has performed a NOx RACT Emissions Stack test on April 10, 2001 for the Caterpillar Generator (600 KW Diesel) in order to comply with this

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condition and with the standard of 9.0 gm/bhp-hr NOx emission limit from the Caterpillar Generator. Review of the stack test report dated April 20, 2001 for NOx emissions from the Caterpillar engine indicates that 8.2 gm/bhp-hr NOx emission limit complies with the standard of 9.0 gm/bhp-hr. The NOx emissions were generated while the Caterpillar engine operated between 90 to 95 percent of its capacity. Therefore, the Caterpillar engine must operate at a minimum of 90 % of its capacity. The result of the stack test indicates that the Caterpillar Generator has met the 9.0 grams/brake hp-hr NOx emission limit and therefore, it is in compliance.

Manufacturer Name/Model Number: CATERPILLAR GENERATOR - 600 KW DIESEL

Reference Test Method: Method 7, 7E or 19

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2002.

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

Condition 61: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005A
Process: 002 Emission Source: 0005A

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

Item 61.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

NOx emission limit for a lean burn internal combustion engine which fires other or multiple fuels. Stack testing will be required in order to demonstrate compliance with the regulatory standard.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 9.0 grams per brake horsepower-hour



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Reference Test Method: App A, M 7, 7E or 19

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 62: Compliance Certification

Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 62.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005A

Process: 002 Emission Source: 0005A

Regulated Contaminant(s):

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

Item 62.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To ensure that the unit runs at optimum conditions and stays in compliance with the NOx RACT emission limit, periodic maintenance will be performed in accordance with manufacturer's specifications. These specific procedures are outlined in the manufacturer's specification manual for the unit. Other components of the periodic maintenance program for the unit include those actions necessitated by the results of monitoring the following data: diagnostic data obtained after a set number of operating hours, engine oil analysis, and fuel consumption versus power output of the unit.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 63: Compliance Certification

Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.4(f)(2)(ii)

Item 63.1:

The Compliance Certification activity will be performed for:



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Emission Unit: 2-00002 Emission Point: 0005A
Process: 002 Emission Source: 0005A

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

Item 63.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

EFFECTIVE MAY 31, 1995, ANY OWNER OR OPERATOR OF A STATIONARY INTERNAL COMBUSTION ENGINE OF 225 HORSEPOWER OR LARGER IN THE SEVERE NONATTAINMENT AREA, WHICH PROVIDES PRIMARY POWER OR IS USED FOR PEAK SHAVING GENERATION, MUST COMPLY WITH THE FOLLOWING EMISSION LIMIT FOR LEAN BURN ENGINES:

(I) 3.0 GRAMS PER BRAKE HORSEPOWER-HOUR FOR GAS ONLY FIRED UNITS;
OR

(II) 9.0 GRAMS PER BRAKE HORSEPOWER-HOUR FOR UNITS FIRING OTHER FUELS.

COMPLIANCE WITH THESE EMISSION LIMITS SHALL BE DETERMINED WITH A ONE HOUR AVERAGE IN ACCORDANCE WITH SECTION 227-2.6(a)(7) OF THIS SUBPART UNLESS THE OWNER/OPERATOR OPTS TO UTILIZE CEMS UNDER THE PROVISIONS OF SECTION 227-2.6(a)(2) OF THIS SUBPART. IF CEMS ARE UTILIZED, THE REQUIREMENTS OF SECTION 227-2.6(b) APPLY, INCLUDING THE USE OF A 24 HOUR AVERAGING PERIOD.

Manufacturer Name/Model Number: CATERPILLAR GENERATOR - 600 KW DIESEL

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 9.0 grams per brake horsepower-hour

Reference Test Method: MT& 40 CFR 60 APP A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 64: Compliance Certification

Effective between the dates of 10/19/2001 and 10/18/2006

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Applicable Federal Requirement: 6NYCRR 227-2.6(a)(2)

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005A
Process: 002 Emission Source: 0005A

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

Item 64.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner/operator of internal combustion engines may opt to employ a continuous emissions monitoring system (CEMS), or equivalent, in lieu of the monitoring requirements to perform initial compliance stack tests as described in subdivision (c) of this section. Those internal combustion engines which opt to monitor emissions with a CEMS or equivalent shall follow the requirements of subdivision (b) of this section to demonstrate compliance, including a 24 hour daily arithmetic average NO_x emission rate.

Manufacturer Name/Model Number: CEMS
Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 9.0 grams per brake horsepower-hour
Reference Test Method: CEMS
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: 24 HOUR DAILY AVERAGE (ARITHMETIC MEAN)
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-13: Compliance Certification

Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(a)(7)

Item 1-13.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005A
Process: 002 Emission Source: 0005A



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Regulated Contaminant(s):

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

Item 1-13.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

On a daily basis, the facility will keep records
of:

1. The number 2 fuel usage for each generator in gallons per day and
2. The hours of operation for each generator in hours per day.

Records will be maintained for five years at the facility.

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NO_x emissions to demonstrate compliance with Subpart 2.6(a). Hugo Neu Schnitzer East-Queens Yard has performed a NO_x RACT Emissions Stack Test on October 20, 2000 for the Main Generator, on May 23, 2000 for the Cummins Generator and on April 10, 2001 for the Caterpillar Generator in order to comply with this condition and with the NO_x emissions from the three internal combustion engines.

The purpose of the stack test program is to establish emission levels for the three engine generators to compare to the established emissions limits set forth in 6 NYCRR 227-2. The New York State Department of Environmental Conservation (NYSDEC) sets these emissions limits as part of the NO_x RACT rules. The Main Generator at this facility, whose capacity is 9,630 horsepower was tested on October 20, 2000, and the Cummins auxiliary engine (300-kilowatt) was tested on May 23, 2000. Both engines were found to comply with these emissions limits. The result of the stack test indicates that the Main Generator and the Cummins Generator are in compliance with the standard of 9.0 gm/bhp-hr NO_x emission limit. The Caterpillar Generator at this facility was tested on April 10, 2001. Modifications of the Caterpillar engine were completed on February 15, 2001 and included valve adjustments and retarding the injection timing by 5.5



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degrees. The Caterpillar Generator generated 8.2 gm/bhp-hr NOx emission which complies with the standard of 9.0 gm/bhp-hr NOx emission limit, but this was achieved while operating the Caterpillar engine between 90 and 95 percent of its capacity. The test program consisted of using USEPA test methods to measure emissions from the Caterpillar generator exhaust stack for nitrogen oxides (NOx as NO2), carbon dioxide (CO2), and oxygen (O2). The evaluation was conducted while the generator operated between 90% to 95% of its capacity.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: NUMBER 2 OIL
Manufacturer Name/Model Number: CATERPILLAR GENERATOR - 600 KW DIESEL
Upper Permit Limit: 46,100 gallons per year
Reference Test Method: Method 7, 7E or 19
Monitoring Frequency: DAILY
Averaging Method: ANNUAL MAXIMUM ROLLED DAILY
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/2002.
Subsequent reports are due every 3 calendar month(s).

Condition 1-14: Compliance Certification

Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(a)(7)

Item 1-14.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005A
Process: 002 Emission Source: 0005A

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

Item 1-14.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NOx emissions to demonstrate compliance with Subpart 2.6(a).

The Main Generator - 9630 HP Diesel, Emission Point 00001

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has the potential to operate up to 3,050 hours per year (an increase from 2,700 hours per year). The number 2 diesel fuel usage for the Main generator will increase from 814,600 to 919,600 gallons per year. And the number 2 diesel fuel usage for the facility will increase from 908,000 to 1,013,000 gallons per year. The average fuel usage is 301.5 gallons per hour.

The Caterpillar Generator - 600 KW Diesel, Emission Point 0005A has the potential to operate up to 3,750 hours per year. The average fuel usage is 12.3 gallons per hour.

The Cummins Generator - 300 KW Diesel, Emission Point 0005B has the potential to operate up to 4,500 hours per year. The average fuel usage is 10.5 gallons per hour.

Number 2 Diesel		
Fuel Usage	Emission	Max Annual
1997 Annual		
Point	(gallons)	(gallons)
Main Generator 571,318	00001	919,600
Caterpillar Generator 43,675	0005A	46,100
Cummins Generator 25,773	0005B	47,300
Total Emission Unit 2-00002		1,013,000 gallons 640,766 gallons

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NOx emissions to demonstrate compliance with Subpart 2.6(a). The purpose of the stack test program is to establish emission levels for the three engine generators to compare to the established emissions limits set forth in 6 NYCRR 227-2. The New York State Department of Environmental



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Conservation (NYSDEC) sets these emissions limits as part of the NO_x RACT rules. Hugo Neu Schnitzer East - Queens Yard has performed the latest NO_x RACT Emissions Stack Test on October 20, 2000 for the Main Generator (9,630 HP), on May 23, 2000 for the Cummings Generator (300 KW) and on April 10, 2001 for the Caterpillar Generator (600 KW) in order to comply with this condition and with the NO_x emissions from the three internal combustion engines. The result of the stack test indicates that the Main Generator and the Cummins Generator has met the 9.0 grams/brake hp-hr NO_x emission limit (are in compliance). Actual Emissions from latest NO_x RACT Emissions Stack Test (October 20, 2000) for the Main Generator averaged 87.3 lbs/hr of NO_x (compared with 97.5 in previous stack tests) after reducing the NO_x emission by modifying the Main Engine-Generator by retarding the ignition timing by 1.5 degrees in September 2000. Modifications of the Caterpillar engine was completed on February 15, 2001 and included valve adjustments and retarding the injection timing by 5.5 degrees. The Caterpillar Generator generated 8.2 gm/bhp-hr NO_x emission which complies with the standard of 9.0 gm/bhp-hr NO_x emission limit, but this was achieved while operating the Caterpillar engine between 90 and 95 percent of its capacity. The test program consisted of using USEPA test methods to measure emissions from the Caterpillar generator exhaust stack for nitrogen oxides (NO_x as NO₂), carbon dioxide (CO₂), and oxygen (O₂). The evaluation was conducted while the generator operated between 90% to 95% of its capacity.

In order for the Caterpillar Generator to meet the 9.0 grams/brake hp-hr NO_x emission limit, it must operate at a minimum of 90 % of its capacity. Review of stack test report dated 4/20/2001 for NO_x emissions from the Caterpillar engine indicates that 8.2 gm/bhp-hr which complies with the standard of 9.0 gm/bhp-hr. The NO_x emissions were generated while the Caterpillar engine operated between 90 to 95 percent of its capacity. Based on the stack tests result, all of the three internal combustion engines have been in compliance with the NO_x RACT emissions limit since February 15, 2001.

Manufacturer Name/Model Number: CATERPILLAR GENERATOR - 600 KW DIESEL
Upper Permit Limit: 9.0 grams per brake horsepower-hour
Reference Test Method: App A, M 7, 7E or 19
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

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METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 66: Compliance Certification

Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(c)

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005A
Process: 002 Emission Source: 0005A

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

Item 66.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NO_x emissions to demonstrate compliance with Subpart 2.6(a).

Stack Test Requirements: The owner/operator of those facilities required to stack test under subdivision (a) of this section shall:

1. submit compliance test protocol to the department for approval at least 90 days prior to emission testing. The conditions of the testing and the locations of the sampling devices must be acceptable to the department; and

2. utilize procedures set forth in 40 CFR part 60, Appendix A or any other method acceptable to the department and EPA for determining compliance with the appropriate NO_x limit in section 227-2.4 of this Subpart, and shall follow the procedures set forth in Part 202 of this Title.

For internal combustion engines, utilize Method 7, 7E, or 19 from 40 CFR part 60, Appendix A or another reference method approved by the department.

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Hugo Neu Schnitzer East - Queens Yard has performed a NOx RACT Emissions Stack Test on October 20, 2000 for the Main Generator (9,630 HP), on May 23, 2000 for the Cummins Generator (300 KW) and on April 10, 2001 for the Caterpillar Generator (600 KW) in order to comply with this condition and with the NOx emissions from the three internal combustion engines. The result of the stack test indicates that the Main Generator and the Cummins Generator have met the 9.0 grams/brake hp-hr NOx emission limit (are in compliance). In order for the Caterpillar Generator to meet the 9.0 grams/brake hp-hr NOx emission limit, it must operate at a minimum of 90 % of its capacity. Review of stack test report dated 4/20/2001 for NOx emissions from the Caterpillar engine indicates that 8.2 gm/bhp-hr which complies with the standard of 9.0 gm/bhp-hr. The NOx emissions were generated while the Caterpillar engine operated between 90 to 95 percent of its capacity. Based on the stack test results, all of three internal combustion engines have been in compliance with the NOx RACT emissions limits since February 15, 2001.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 9.0 grams per brake horsepower-hour

Reference Test Method: App A, M 7, 7E or 19

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 67: Compliance Certification

Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-1.3

Item 67.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B

Item 67.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

Operators of oil-fired internal combustion engines which are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

1) Observe the stack for each internal combustion engine which is operating on oil once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- weather condition
- was a plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days firing oil (the firing of other fuels in between days of firing oil does not count as an interruption in the consecutive days of firing oil), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence.

The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the



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stack.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 68: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 68.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 68.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity (on a six minute block period) except for one six minute block period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

Operators of air contamination sources that are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

- 1) Observe the stack(s) or vent(s) once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).
- 2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:
 - weather condition
 - was a plume observed?

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This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days, then the Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2002.

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

Condition 69: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(a)(7)

Item 69.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B

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Regulated Contaminant(s):

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

Item 69.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

On a daily basis, the facility will keep records
of:

1. The number 2 fuel usage for each generator in gallons per day and
2. The hours of operation for each generator in hours per day.

Records will be maintained for five years at the facility.

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NO_x emissions to demonstrate compliance with Subpart 2.6(a).

Hugo Neu Schnitzer East-Queens Yard has performed a NO_x RACT Emissions Stack Test on October 20, 2000 for the Main Generator, on May 23, 2000 for the Cummins Generator and on April 10, 2001 for the Caterpillar Generator in order to comply with this condition and with the NO_x emissions from the three internal combustion engines.

The purpose of the stack test program is to establish emission levels for the three engine generators to compare to the established emissions limits set forth in 6 NYCRR 227-2. The New York State Department of Environmental Conservation (NYSDEC) sets these emissions limits as part of the NO_x RACT rules. The Main Generator at this facility, whose capacity is 9,630 horsepower was tested on October 20, 2000, and the Cummins auxiliary engine (300-kilowatt) was tested on May 23, 2000. Both engines were found to comply with these emissions limits. The result of the stack test indicates that the Main Generator and the Cummins Generator are in compliance with the standard of 9.0 gm/bhp-hr NO_x emission limit. The Caterpillar Generator at this facility was tested on April 10, 2001. Modifications of the Caterpillar engine were completed on February 15, 2001 and included valve



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adjustments and retarding the injection timing by 5.5 degrees. The Caterpillar Generator generated 8.2 gm/bhp-hr NOx emission which complies with the standard of 9.0 gm/bhp-hr NOx emission limit, but this was achieved while operating the Caterpillar engine between 90 and 95 percent of its capacity. The test program consisted of using USEPA test methods to measure emissions from the Caterpillar generator exhaust stack for nitrogen oxides (NOx as NO2), carbon dioxide (CO2), and oxygen (O2). The evaluation was conducted while the generator operated between 90% to 95% of its capacity.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: NUMBER 2 OIL
Manufacturer Name/Model Number: CUMMINS GENERATOR - 300 KW DIESEL
Upper Permit Limit: 47,300 gallons per day
Reference Test Method: Method 7, 7E or 19
Monitoring Frequency: DAILY
Averaging Method: ANNUAL MAXIMUM ROLLED DAILY
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2002.
Subsequent reports are due every 3 calendar month(s).

Condition 1-15: Compliance Certification
Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227.2(b)(1)

Item 1-15.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B
Process: 002

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

Item 1-15.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
Particulate emission limit for a stationary combustion installation firing oil. The owner or operator shall complete the following once per term of this permit:

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- 1) submit, to the Department, an acceptable protocol for the testing of particulate emission limit cited in this condition,
- 2) perform a stack test, based upon the approved test protocol, to determine compliance with the particulate emission limit cited in this condition, and
- 3) all records shall be maintained at the facility for a minimum of five years.

Manufacturer Name/Model Number: CUMMINS GENERATOR - 300 KW Diesel Generator
(Backup)

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2003.

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

Condition 1-16: Compliance Certification

Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.

Item 1-16.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B

Process: 002 Emission Source: 0005B

Regulated Contaminant(s):

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

Item 1-16.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An emission compliance evaluation or stack testing was conducted on each generator (Main, Caterpillar & Cummins) to establish that the units are in compliance with NYSDEC NOx RACT rules and emission limit, 6 NYCRR 227-2.

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Hugo Neu Schnitzer East - Queens Yard has performed a NOx RACT Emissions Stack test on May 23, 2000 for the Cummins Generator (300 KW Diesel) in order to comply with this condition and with the standard of 9.0 gm/bhp-hr NOx emission limit from the Cummins Generator. The result of the stack test indicates that the Cummins Generator has met the 9.0 grams/brake hp-hr NOx emission limit and therefore, it is in compliance.

Manufacturer Name/Model Number: CUMMINS GENERATOR - 300 KW DIESEL
Reference Test Method: Method 7, 7E or 19

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2002.

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

Condition 71: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 71.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B
Process: 002 Emission Source: 0005B

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

Item 71.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

NOx emission limit for a lean burn internal combustion engine which fires other or multiple fuels. Stack testing will be required in order to demonstrate compliance with the regulatory standard.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 9.0 grams per brake horsepower-hour

Reference Test Method: App A, M 7, 7E or 19

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE



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Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 72: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

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

Item 72.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B
Process: 002 Emission Source: 0005B

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

Item 72.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To ensure that the unit runs at optimum conditions and stays in compliance with the NO_x RACT emission limit, periodic maintenance will be performed in accordance with manufacturer's specifications. These specific procedures are outlined in the manufacturer's specification manual for the unit. Other components of the periodic maintenance program for the unit include those actions necessitated by the results of monitoring the following data: diagnostic data obtained after a set number of operating hours, engine oil analysis, and fuel consumption versus power output of the unit.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 73: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.4(f)(2)(ii)

Item 73.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B
Process: 002 Emission Source: 0005B

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Regulated Contaminant(s):

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

Item 73.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

EFFECTIVE MAY 31, 1995, ANY OWNER OR OPERATOR OF A STATIONARY INTERNAL COMBUSTION ENGINE OF 225 HORSEPOWER OR LARGER IN THE SEVERE NONATTAINMENT AREA, WHICH PROVIDES PRIMARY POWER OR IS USED FOR PEAK SHAVING GENERATION, MUST COMPLY WITH THE FOLLOWING EMISSION LIMIT FOR LEAN BURN ENGINES:

(I) 3.0 GRAMS PER BRAKE HORSEPOWER-HOUR FOR GAS ONLY FIRED UNITS;
OR

(II) 9.0 GRAMS PER BRAKE HORSEPOWER-HOUR FOR UNITS FIRING OTHER FUELS.

COMPLIANCE WITH THESE EMISSION LIMITS SHALL BE DETERMINED WITH A ONE HOUR AVERAGE IN ACCORDANCE WITH SECTION 227-2.6(a)(7) OF THIS SUBPART UNLESS THE OWNER/OPERATOR OPTS TO UTILIZE CEMS UNDER THE PROVISIONS OF SECTION 227-2.6(a)(2) OF THIS SUBPART. IF CEMS ARE UTILIZED, THE REQUIREMENTS OF SECTION 227-2.6(b) APPLY, INCLUDING THE USE OF A 24 HOUR AVERAGING PERIOD.

Manufacturer Name/Model Number: CUMMINS GENERATOR - 300 KW DIESEL

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 9.0 grams per brake horsepower-hour

Reference Test Method: MT& 40 CFR 60 APP A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 74: Compliance Certification

Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(a)(2)



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Item 74.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B
Process: 002 Emission Source: 0005B

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

Item 74.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

The owner/operator of internal combustion engines may opt to employ a continuous emissions monitoring system (CEMS), or equivalent, in lieu of the monitoring requirements to perform initial compliance stack tests as described in subdivision (c) of this section. Those internal combustion engines which opt to monitor emissions with a CEMS or equivalent shall follow the requirements of subdivision (b) of this section to demonstrate compliance, including a 24 hour daily arithmetic average NO_x emission rate.

Manufacturer Name/Model Number: CEMS
Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 9.0 grams per brake horsepower-hour
Reference Test Method: CEMS
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: 24 HOUR DAILY AVERAGE (ARITHMETIC MEAN)
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-17: Compliance Certification

Effective between the dates of 09/05/2002 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(a)(7)

Item 1-17.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B
Process: 002 Emission Source: 0005B

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

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Item 1-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NOx emissions to demonstrate compliance with Subpart 2.6(a).

The Main Generator - 9630 HP Diesel, Emission Point 00001 has the potential to operate up to 3,050 hours per year.

The number 2 diesel fuel usage for the Main generator will increase from 814,600 to 919,600 gallons per year. And the number 2 diesel fuel usage for the facility will increase from 908,000 to 1,013,000 gallons per year. The average fuel usage is 301.5 gallons per hour.

The Caterpillar Generator - 600 KW Diesel, Emission Point 0005A has the potential to operate up to 3,750 hours per year. The average fuel usage is 12.3 gallons per hour.

The Cummins Generator - 300 KW Diesel, Emission Point 0005B has the potential to operate up to 4,500 hours per year. The average fuel usage is 10.5 gallons per hour.

Number 2 Diesel		
Fuel Usage		
	Emission	Max Annual
1997 Annual		
Point	(gallons)	(gallons)
Main Generator 571,318	00001	919,600
Caterpillar Generator 43,675	0005A	46,100
Cummins Generator 25,773	0005B	47,300
Total Emission Unit 2-00002		1,013,000 gallons

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640,766 gallons

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NO_x emissions to demonstrate compliance with Subpart 2.6(a). The purpose of the stack test program is to establish emission levels for the three engine generators to compare to the established emissions limits set forth in 6 NYCRR 227-2. The New York State Department of Environmental Conservation (NYSDEC) sets these emissions limits as part of the NO_x RACT rules. Hugo Neu Schnitzer East - Queens Yard has performed the latest NO_x RACT Emissions Stack Test on October 20, 2000 for the Main Generator (9,630 HP), on May 23, 2000 for the Cummins Generator (300 KW) and on April 10, 2001 for the Caterpillar Generator (600 KW) in order to comply with this condition and with the NO_x emissions from the three internal combustion engines. The result of the stack test indicates that the Main Generator and the Cummins Generator has met the 9.0 grams/brake hp-hr NO_x emission limit (are in compliance). Actual Emissions from latest NO_x RACT Emissions Stack Test (October 20, 2000) for the Main Generator averaged 87.3 lbs/hr of NO_x (compared with 97.5 in previous stack tests) after reducing the NO_x emission by modifying the Main Engine-Generator by retarding the ignition timing by 1.5 degrees in September 2000. Modifications of the Caterpillar engine were completed on February 15, 2001 and included valve adjustments and retarding the injection timing by 5.5 degrees. The Caterpillar Generator generated 8.2 gm/bhp-hr NO_x emission which complies with the standard of 9.0 gm/bhp-hr NO_x emission limit, but this was achieved while operating the Caterpillar engine between 90 and 95 percent of its capacity. The test program consisted of using USEPA test methods to measure emissions from the Caterpillar generator exhaust stack for nitrogen oxides (NO_x as NO₂), carbon dioxide (CO₂), and oxygen (O₂). The evaluation was conducted while the generator operated between 90% to 95% of its capacity.

In order for the Caterpillar Generator to meet the 9.0 grams/brake hp-hr NO_x emission limit, it must operate at a minimum of 90 % of its capacity. Review of stack test report dated 4/20/2001 for NO_x emissions from the Caterpillar engine indicates that 8.2 gm/bhp-hr which complies with the standard of 9.0 gm/bhp-hr. The NO_x emissions were generated while the Caterpillar engine



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operated between 90 to 95 percent of its capacity. Based on the stack tests result, all of the three internal combustion engines have been in compliance with the NOx RACT emissions limit since February 15, 2001.

Manufacturer Name/Model Number: CUMMINS GENERATOR - 300 KW DIESEL

Upper Permit Limit: 9.0 grams per brake horsepower-hour

Reference Test Method: App A, M 7, 7E or 19

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 76: Compliance Certification
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(c)

Item 76.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00002 Emission Point: 0005B
Process: 002 Emission Source: 0005B

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

Item 76.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner/operator of internal combustion engines shall perform initial compliance stack tests as described in subdivision (c) of this section to verify NOx emissions to demonstrate compliance with Subpart 2.6(a).

Stack Test Requirements: The owner/operator of those facilities required to stack test under subdivision (a) of this section shall:

1. submit compliance test protocol to the department for approval at least 90 days prior to emission testing. The conditions of the testing and the locations of the sampling devices must be acceptable to the department; and

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2. utilize procedures set forth in 40 CFR part 60, Appendix A or any other method acceptable to the department and EPA for determining compliance with the appropriate NOx limit in section 227-2.4 of this Subpart, and shall follow the procedures set forth in Part 202 of this Title.

For internal combustion engines, utilize Method 7, 7E, or 19 from 40 CFR part 60, Appendix A or another reference method approved by the department.

Hugo Neu Schnitzer East - Queens Yard has performed a NOx RACT Emissions Stack Test on October 20, 2000 for the Main Generator (9,630 HP), on May 23, 2000 for the Cummins Generator (300 KW) and on April 10, 2001 for the Caterpillar Generator (600 KW) in order to comply with this condition and with the NOx emissions from the three internal combustion engines. The result of the stack test indicates that the Main Generator and the Cummins Generator has met the 9.0 grams/brake hp-hr NOx emission limit (are in compliance). In order for the Caterpillar Generator to meet the 9.0 grams/brake hp-hr NOx emission limit, it must operate at a minimum of 90 % of its capacity. Review of stack test report dated 4/20/2001 for NOx emissions from the Caterpillar engine indicates that 8.2 gm/bhp-hr which complies with the standard of 9.0 gm/bhp-hr. The NOx emissions were generated while the Caterpillar engine operated between 90 to 95 percent of its capacity. Based on the stack test results, all of three internal combustion engines have been in compliance with the NOx RACT emissions limits since February 15, 2001.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 9.0 grams per brake horsepower-hour

Reference Test Method: App A, M 7, 7E or 19

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable and are not subject to annual compliance certification requirements for Title V permits.

Condition 1-18: Contaminant List

Effective between the dates of 09/05/2002 and 10/18/2006

Applicable State Requirement: ECL 19-0301.

Item 1-18.1:

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



New York State Department of Environmental Conservation

Permit ID: 2-6304-00268/00015

Facility DEC ID: 7034600032

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

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

Condition 1-19: Unavoidable noncompliance and violations
Effective between the dates of 09/05/2002 and 10/18/2006

Applicable State Requirement: 6NYCRR 201-1.4

Item 1-19.1:

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

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

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

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

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air

New York State Department of Environmental Conservation

Permit ID: 2-6304-00268/00015

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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 80: Air pollution prohibited
Effective between the dates of 10/19/2001 and 10/18/2006

Applicable State Requirement: 6NYCRR 211.2

Item 80.1:

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.