



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Solid Waste Management

Permit ID: 5-0942-00006/00006

Mod 0 Effective Date: 03/01/2002 Expiration Date: 02/28/2007

Mod 1 Effective Date: 03/01/2002 Expiration Date: 02/28/2007

Mod 2 Effective Date: 12/03/2003 Expiration Date: 02/28/2007

Mod 4 Effective Date: 06/29/2004 Expiration Date: 12/31/2004

Mod 5 Effective Date: 09/07/2004 Expiration Date: 02/28/2007

Mod 6 Effective Date: 12/03/2004 Expiration Date: 02/28/2007

Permit Type: Air State Facility

Permit ID: 5-0942-00006/00009

Effective Date:

Expiration Date:

Permit Issued To: CITY OF PLATTSBURGH
41 CITY HALL PL
PLATTSBURGH, NY 12901

Facility: CLINTON COUNTY SLUDGE COMPOSTING FAC
RUGAR ST
PLATTSBURGH, NY 12901

Contact: JONATHAN P RUFF
ENVIRONMENTAL SERVICES DEPT
41 CITY HALL PL
PLATTSBURGH, NY 12901-2936
(518) 563-7731

New York State Department of Environmental Conservation
Facility DEC ID: 5094200006



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

Permit Administrator: _____

Address: _____

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Applications for Permit Renewals and Modifications
- Permit modifications, suspensions or revocations by the Department
- Permit Modifications, Suspensions and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal
- REGION 5 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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



Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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

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

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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

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

Item 4.1:

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



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

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

Item 4.1:

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

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

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

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

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 5 Headquarters
Division of Environmental Permits
Route 86, PO Box 296
Ray Brook, NY 12977-0296
(518) 897-1234

New York State Department of Environmental Conservation

Permit ID: 5-0942-00006/00009

Facility DEC ID: 5094200006



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: CITY OF PLATTSBURGH
41 CITY HALL PL
PLATTSBURGH, NY 12901

Facility: CLINTON COUNTY SLUDGE COMPOSTING FAC
RUGAR ST
PLATTSBURGH, NY 12901

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

Permit Effective Date:

Permit Expiration Date:



LIST OF CONDITIONS

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Facility Level

- Submission of Applications for Permit Modification or Renewal
-REGION 5 HEADQUARTERS

FEDERALLY ENFORCEABLE CONDITIONS

Emission Unit Level

EU=1-00001,EP=00001

- 4-1 6 NYCRR 212.4: Compliance Demonstration

EU=1-00001,EP=00001,Proc=AST

- 4-2 6 NYCRR 212.4: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 4 ECL 19-0301: Contaminant List
- 6 6 NYCRR Subpart 201-5: Emission Unit Definition
- 4-3 6 NYCRR 211.2: Compliance Demonstration
- 4-4 6 NYCRR 211.2: Compliance Demonstration
- 4-5 6 NYCRR 211.2: Compliance Demonstration
- 4-6 6 NYCRR 211.2: Compliance Demonstration
- 4-7 6 NYCRR 211.2: Compliance Demonstration
- 8 : Compliance Demonstration
- 4-8 6 NYCRR 211.2: Compliance Demonstration

Emission Unit Level

- 9 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 10 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=1-00001,Proc=NVR

- 19 : Compliance Demonstration
- 20 : Compliance Demonstration

EU=1-00001,EP=00001

- 4-9 6 NYCRR 211.2: Compliance Demonstration



22 : Compliance Demonstration
4-10 6 NYCRR 212.4: Compliance Demonstration
23 : Compliance Demonstration

EU=1-00001,EP=00001,Proc=NVR

25 : Compliance Demonstration



FEDERALLY ENFORCEABLE CONDITIONS
****** Emission Unit Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 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 - 6 NYCRR 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 - 6 NYCRR 200.7

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



required to operate such device effectively.

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR 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 - 6 NYCRR 201-1.5

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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



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

Item F: Recycling and Salvage - 6 NYCRR 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 - 6 NYCRR 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: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 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 requirements, regulations, or law.

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 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 J: Required Emission Tests - 6 NYCRR 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 6 NYCRR Subpart 202-1.

Item K: Visible Emissions Limited - 6 NYCRR 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 L: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

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

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



regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 4-1: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.4

Replaces Condition(s) 23

Item 4-1.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00001 Emission Point: 00001

Regulated Contaminant(s):
CAS No: 007664-41-7 AMMONIA

Item 4-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A performance test demonstrating ammonia removal shall be conducted within 180 days of the date upon which both the AST and BIO processes become operational. Ammonia removal must be at least 70% by weight. If both digesters are not in full operation during this period, additional performance tests will be required within 180 days of their commencement of operation. This performance test must be conducted under maximum throughput and at surrogate parameters described in this permit. Additional testing shall be conducted at the discretion of the Department.

Parameter Monitored: AMMONIA

Lower Permit Limit: 70 percent reduction by weight

Reference Test Method: NIOSH Method 6701

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 4-2: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212.4



Replaces Condition(s) 25

Item 4-2.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00001 Emission Point: 00001
Process: AST

Regulated Contaminant(s):
CAS No: 007664-41-7 AMMONIA

Item 4-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Under the scenario that alkiline stabilization process is operated as the sole process (no contribution to emissions from the Bio process), the emissions rate potential (ERP) for ammonia cannot exceed 9 #/hr. A performance test shall be conducted at worst case (e.g., anaerobically digested sludge) and maximum throughput within 180 days of start up. Additional testing shall be conducted at the discretion of the Department.

Parameter Monitored: AMMONIA

Upper Permit Limit: 9 pounds per hour

Reference Test Method: NIOSH Method 6701

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Item B: 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.



Condition 4: Contaminant List

Effective between the dates of 08/21/2002 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 4.1:

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

CAS No: 007664-41-7

Name: AMMONIA

CAS No: 007782-50-5

Name: CHLORINE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY500-00-0

Name: TOTAL REDUCED SULFUR

CAS No: 0NY998-00-0

Name: VOC

Condition 6: Emission Unit Definition

Effective between the dates of 08/21/2002 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 6.1(From Mod 4):

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

Emission Unit: 1-00001

Emission Unit Description:

This unit consists of the biosolids composting (BIO) and Alkaline Stabilization (AST) processes. Based on present physical constraints the maximum capacities are: 41 dtpd (205 wtpd) for the Alkaline Stabilization process and 28 dtpd for composting. The scrubber treats air from the biosolids composting operations for odor control and discharges to the stack that also ventilates the Alkaline Stabilization process/storage building.

Building(s): AST

Condition 4-3: Compliance Demonstration

Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 211.2

Item 4-3.1:



The Compliance Demonstration activity will be performed for the Facility.

Item 4-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owner/operator shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials and/or neighbors are adequately received and documented, and that appropriate response is taken by the owner/operator. At a minimum, the owner/operator must:

1. Have a complaint phone line available 24 hours a day, 7 days a week. The number should be clearly published in but not limited to the area's phonebooks, on the city's website, and in the local legal notices publicizing the intent to begin operations.
2. Provide rapid investigation (not more than 1 business day) of any possible causes of any complaint received.
3. Take prompt action to abate the circumstances found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and any action taken.

Documentation shall include but is not limited to the following.

- ¿ Date complaint received
- ¿ Name of investigator
- ¿ Location of impacts
- ¿ Date and time of impacts.
- ¿ Complainant's name, phone number, address
- ¿ Nature of complaint
- ¿ If the odor was detected and a description of the odor at the complainant's location
- ¿ Operational variables at the facility
- ¿ Project Manager Notification and action Taken.

5. Report in a format acceptable to the Department.
6. Maintain complaint documentation for a period of five years and make them available to representatives of the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 4-4: Compliance Demonstration
Effective for entire length of Permit**



Applicable State Requirement:6 NYCRR 211.2

Item 4-4.1:

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

Emission Unit: 1-00001

Process: AST

Emission Source: AST-2

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 4-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The Permittee shall maintain a 98% minimum capture efficiency of odors from processed or unprocessed biosolids and product in the operations building and exhaust them through EP 00001. Capture efficiency shall be determined by E.P.A. method 204. Capture efficiency shall be verified within 30 days upon startup and as required upon the Departments request.

Lower Permit Limit: 98 percent

Reference Test Method: 204

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 4-5: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 211.2

Item 4-5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 4-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department; the owner or operator shall conduct an odor study and implement measures that effectively bring odor impacts from the facility within acceptable levels. The study shall be performed pursuant to a Department approved protocol.



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 4-6: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 211.2

Item 4-6.1:

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

Emission Unit: 1-00001

Item 4-6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Permittee shall continuously monitor and record operational status (on/off) of the large dispersion fan (rated 400,000 cfm). The dispersion fan will be operational if processed or unprocessed biosolids and/or product are in any of the buildings. Records will be kept and maintained on site for three years and records will be available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 4-7: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 211.2

Item 4-7.1:

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

Emission Unit: 1-00001
Process: AST

Emission Source: AST-2

Item 4-7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Permittee shall continuously monitor and record operational status (on/off) of the scrubber fan (rated 40,000 cfm). The scrubber fan will be operational if

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processed biosolids, or unprocessed biosolids are in any of the buildings. Records will be kept and maintained on site for three years and records will be available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Compliance Demonstration
Effective between the dates of 08/21/2002 and Permit Expiration Date

Applicable State Requirement:

Replaced by Condition(s) 4-8

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The emission of odor-causing compound(s) (e.g, TRS, etc.) from the uncontrolled sources shall have an odor intensity of less than 5 dilutions to threshold (D/T) based on a short-term peak value of 5 minutes or less at any off-site receptor. At the discretion of the Department, the facility shall conduct a performance test and air modeling (using a protocol approved by the Department) of Nviro product storage piles. Emissions shall be modeled at full storage capacity to demonstrate compliance with short-term intensity of no greater than 5 D/T.

Within 60 days of beginning compost production, the facility will conduct a performance test and modeling to demonstrate compliance as described above.

Further performance tests shall be conducted at the discretion of the Department.

Compliance with this odor limit does not relieve the permittee from compliance with 6 NYCRR, Section 211.2 on a continuous basis.

Parameter Monitored: CONCENTRATION

Upper Permit Limit: 5 dilutions to threshold

Reference Test Method: ASTM Method E679-91

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST



METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 4-8: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement: 6 NYCRR 211.2

Replaces Condition(s) 8

Item 4-8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 4-8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The emission of odor-causing compound(s) (e.g, TRS, etc.) from the uncontrolled sources shall have an odor intensity of less than 5 dilutions to threshold (D/T) based on a short-term peak value of 5 minutes or less at any off-site receptor. At the discretion of the Department, the facility shall conduct a performance test and air modeling (using a protocol approved by the Department) of Alkaline stabilized product storage piles. Emissions shall be modeled at full storage capacity to demonstrate compliance with short-term intensity of no greater than 5 D/T.

Within 60 days of beginning compost production, the facility will conduct a performance test and modeling to demonstrate compliance as described above.

Further performance tests shall be conducted at the discretion of the Department.

Compliance with this odor limit does not relieve the permittee from compliance with 6 NYCRR, Section 211.2 on a continuous basis.

Parameter Monitored: CONCENTRATION

Upper Permit Limit: 5 dilutions to threshold

Reference Test Method: ASTM Method E679-91

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



**** Emission Unit Level ****

Condition 9: Emission Point Definition By Emission Unit
Effective between the dates of 08/21/2002 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 9.1(From Mod 4):

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

Emission Unit: 1-00001

Emission Point: 00001

Height (ft.): 117

Diameter (in.): 168

NYTMN (km.): 4948.039 NYTME (km.): 619.529 Building: AST

Emission Point: 00002

Height (ft.): 33

Diameter (in.): 34

NYTMN (km.): 4948.2 NYTME (km.): 619.5

Condition 10: Process Definition By Emission Unit
Effective between the dates of 08/21/2002 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 10.1(From Mod 4):

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

Emission Unit: 1-00001

Process: AST

Source Classification Code: 5-01-007-99

Process Description:

The alkaline stabilization process involves mixing lime and lime-based materials into biosolids increasing the pH and temperature to reduce pathogens according to the EPA part 503 regulations. Other materials such as fly Ash may also be added to dry the material.

Emission Source/Control: AST-1 - Process

Design Capacity: 41 tons per day

Emission Source/Control: AST-2 - Process

Design Capacity: 41 tons per day

Item 10.2(From Mod 4):

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

Emission Unit: 1-00001

Process: BIO

Source Classification Code: 5-01-007-99

Process Description:

This process (BIO) consists of in-vessel composting of biosolids from municipal wastewater treatment plants. Composting is accomplished in two radially fed circular



digesters (DIG-1 and DIG-2). Each digester has a maximum throughput of 14 dtpd. This process includes the odor control scrubber (OCS-1) used for treating emissions during composting and from materials to be composted. Process emissions associated with screening (SCRN1), curing piles and EP 00002 are not scrubbed. Emissions from this process are subject to percent removals identified in 6 NYCRR, Section 212.9. Composting digesters will be operated in negative aeration mode if both units are operated simultaneously. When only one digester is operated, it can be operated in either positive or negative aeration mode.

Emission Source/Control: OCS-1 - Control
Control Type: WET SCRUBBER

Emission Source/Control: DIG-1 - Process
Design Capacity: 14 tons per day

Emission Source/Control: DIG-2 - Process
Design Capacity: 14 tons per day

Emission Source/Control: SCRN1 - Process
Design Capacity: 7 cubic feet per minute

Emission Source/Control: STO-1 - Process

Item 10.3(From Mod 4):

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

Emission Unit: 1-00001

Process: NVR

Source Classification Code: 5-01-007-99

Process End Date: 10/31/2007

Process Description:

The Nviro process involves mixing of lime, lime-based materials and optionally fly ash with biosolids. The facility has a maximum capacity of 41 dtpd due to physical constraints (designated curing pile space of 3100 sq ft).

Fine alkaline materials are uniformly mixed by mechanical mixing with dewatered sludge to raise the pH and temperature. The addition of alkaline material heats the biosolids via exothermic reactions. Sufficient alkaline material is added to raise the pH to >12 and to maintain temperatures => 52C (126F) throughout the sludge pile for =>12 hours. Then the sludge is shredded (optional) and placed in piles where the pH remains >12 for 3 more days. At the end of each of the three days, the piles are re-shredded (optional) to promote air drying to a solids content of => 50%. This process will be exhausted through a common emission point (dilution stack EP 00001) along with the BIO process.

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Emission Source/Control: NVIRO - Process
Design Capacity: 41 tons per day

Condition 19: Compliance Demonstration
Effective between the dates of 08/21/2002 and Permit Expiration Date

Applicable State Requirement:

Expired by Mod 4

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00001
Process: NVR

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

No more than 74 cubic yards of raw sludge can be stored in the curing/storage building (NVIRO) or the receiving storage bins during Nviro processing. Emissions from these sources must be exhausted through EP 00001. Records of time received, quantity of deliveries and processing speed must be recorded. No raw sludge can be stored on-site during non-processing periods.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: SLUDGE

Upper Permit Limit: 74 cubic yards

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 20: Compliance Demonstration
Effective between the dates of 08/21/2002 and Permit Expiration Date

Applicable State Requirement:

Expired by Mod 4

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00001
Process: NVR

Item 20.2:

Compliance Demonstration shall include the following monitoring:



Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The permittee shall monitor and record on a per batch basis, the percent by volume of anaerobically digested/ undigested sludge processed per hour. The maximum allowable anaerobically digested/ undigested sludge processed per hour is 25 % by volume. This limit may be modified pending stack test results.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: SLUDGE

Upper Permit Limit: 25 percent by volume

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 4-9: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement: 6 NYCRR 211.2

Replaces Condition(s) 22

Item 4-9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00001

Emission Point: 00001

Regulated Contaminant(s):

CAS No: 007664-41-7 AMMONIA

CAS No: 0NY998-00-0 VOC

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 4-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The permittee shall conduct performance tests to determine stack odor intensity (in units of dilution to threshold (D/T)) as detected by a panel of observers. The D/T in the stack must be no greater than 500 D/T at any time, based on a short-term peak value of 5 minutes or less. Performance tests shall be conducted within 180 days of start up of each source and/or any combination and with all sources in simultaneous operation. If all sources are tested simultaneously at full production prior to individually/combined testing, the individually/combined testing can be omitted. Performance



testing shall be conducted under worst case conditions (e.g., while processing anaerobically digested sludge) at maximum throughput and at surrogate parameters described by this permit. If sources are not in full production within 180 days of start up, additional performance tests will be required within 180 days of obtaining full production. Additional testing shall be conducted at the discretion of the Department. Compliance with this odor limit does not relieve the permittee from compliance with 6 NYCRR, Section 211.2 on a continuous basis, nor does it relieve the permittee from compliance with applicable requirements of 6 NYCRR 200 and/or 212.

Parameter Monitored: CONCENTRATION

Upper Permit Limit: 500 dilutions to threshold

Reference Test Method: ASTM Method E679-91

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 22: Compliance Demonstration
Effective between the dates of 08/21/2002 and Permit Expiration Date

Applicable State Requirement:

Replaced by Condition(s) 4-9

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00001

Emission Point: 00001

Regulated Contaminant(s):

CAS No: 007664-41-7 AMMONIA

CAS No: 0NY998-00-0 VOC

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The permittee shall conduct performance tests to determine stack odor intensity (in units of dilution to threshold (D/T)) as detected by a panel of observers. The D/T in the stack must be no greater than 100 D/T at any time, based on a short-term peak value of 5 minutes or less. Performance tests shall be conducted within 180 days of start up of each source and/or any combination and with all sources in simultaneous operation. If all sources are tested simultaneously at full production prior



to individually/combined testing, the individually/combined testing can be omitted. Performance testing shall be conducted under worst case conditions (e.g., while processing anaerobically digested sludge) at maximum throughput and at surrogate parameters described by this permit. If sources are not in full production within 180 days of start up, additional performance tests will be required within 180 days of obtaining full production. Additional testing shall be conducted at the discretion of the Department. Compliance with this odor limit does not relieve the permittee from compliance with 6 NYCRR, Section 211.2 on a continuous basis, nor does it relieve the permittee from compliance with applicable requirements of 6 NYCRR 200 and/or 212.

Parameter Monitored: CONCENTRATION

Upper Permit Limit: 100 dilutions to threshold

Reference Test Method: ASTM Method E679-91

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 4-10: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 212.4

Item 4-10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00001

Emission Point: 00001

Regulated Contaminant(s):

CAS No: 007664-41-7

AMMONIA

Item 4-10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A performance test demonstrating ammonia removal shall be conducted within 180 days of the date upon which both the AST and BIO processes become operational. Ammonia removal must be at least 70% by weight. If both digesters are not in full operation during this period, additional performance tests will be required within 180 days of their commencement of operation. This performance test must be conducted under maximum throughput and at surrogate parameters described in this permit. Additional testing shall be conducted at the discretion of the

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Parameter Monitored: AMMONIA

Lower Permit Limit: 70 percent reduction by weight

Reference Test Method: NIOSH Method 6701

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 23: Compliance Demonstration
Effective between the dates of 08/21/2002 and Permit Expiration Date

Applicable State Requirement:

Replaced by Condition(s) 4-1

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00001

Emission Point: 00001

Regulated Contaminant(s):

CAS No: 007664-41-7 AMMONIA

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A performance test demonstrating ammonia removal shall be conducted within 180 days of the date upon which both the NVR and BIO processes become operational. Ammonia removal must be at least 70% by weight. If both digesters are not in full operation during this period, additional performance tests will be required within 180 days of their commencement of operation. This performance test must be conducted under maximum throughput and at surrogate parameters described in this permit. Additional testing shall be conducted at the discretion of the Department.

Parameter Monitored: AMMONIA

Lower Permit Limit: 70 percent reduction by weight

Reference Test Method: NIOSH Method 6701

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 25: Compliance Demonstration



Effective between the dates of 08/21/2002 and Permit Expiration Date

Applicable State Requirement:

Replaced by Condition(s) 4-2

Item 25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-00001 Emission Point: 00001
Process: NVR

Regulated Contaminant(s):
CAS No: 007664-41-7 AMMONIA

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Under the scenario that Nviro process is operated as the sole process (no contribution to emissions from the Bio process), the emissions rate potential (ERP) for ammonia cannot exceed 9 #/hr. A performance test shall be conducted at worst case (e.g., anaerobically digested sludge) and maximum throughput within 180 days of start up. Additional testing shall be conducted at the discretion of the Department.

Parameter Monitored: AMMONIA

Upper Permit Limit: 9 pounds per hour

Reference Test Method: NIOSH Method 6701

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

