



New York State Department of Environmental Conservation
Permit Review Report

Permit ID: 4-0101-00020/00012
06/21/2016

Facility Identification Data

Name: ALBANY COUNTY SEWER DISTRICT - SOUTH PLANT
Address: 209 CHURCH ST
ALBANY, NY 12204

Owner/Firm

Name: ALBANY COUNTY SEWER DISTRICT
Address: 1 CANAL RD S
MENANDS, NY 12204, USA
Owner Classification: Municipal

Permit Contacts

Division of Environmental Permits:
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Phone:

Division of Air Resources:
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ALBANY, NY 12233-3254
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Air Permitting Contact:
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Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

This project consists of a minor modification to the Title V permit for Albany County Sewer District - South Plant in order to incorporate operating limits established during the facility's initial performance test. Those limits include: the minimum incinerator temperature, minimum scrubber pressure drop, minimum scrubber flow, and scrubber outlet pH.



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Attainment Status

ALBANY COUNTY SEWER DISTRICT - SOUTH PLANT is located in the town of ALBANY in the county of ALBANY.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

Albany County Sewer District (ACSD) operates a wastewater treatment facility (South Plant) that is permitted for an average flow of 29 million gallons per day (MGD). Primary components of the wastewater treatment process consist of preliminary treatment (grit screens), primary clarifiers, aeration tanks, final clarifier, sludge holding tanks, and chlorination tanks. Sludge removed during the wastewater treatment process is thickened using dissolved air flotation units, chemically conditioned for odor control and coagulation/flocculation, and then dewatered using a belt press. The cake from the belt press is incinerated in one of two multiple hearth incinerators, each of which vents to a VenturiPak (TM) scrubber system, with only one incinerator in operation at any given time. Incinerator ash is managed in two on-site lagoons, where the ash is allowed to dry prior to being sent off site for use or disposal.

The South Plant includes a non-exempt 1250 kW diesel fired stationary internal combustion engine that is primarily used for emergency backup purposes, but also may be operated in a demand response program for less than 50 hours/year. The engine is subject to 40 CFR 63 Subpart ZZZZ. Diesel fuel for the engine is stored in a 4,000 gallon horizontal storage tank that is exempt from permitting per 6 NYCRR Part 201-3.2(c)(26).

Permit Structure and Description of Operations

The Title V permit for ALBANY COUNTY SEWER DISTRICT - SOUTH PLANT is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air



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pollutants from an activity (i.e., process). Emission sources are categorized by the following types:
combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

ALBANY COUNTY SEWER DISTRICT - SOUTH PLANT is defined by the following emission unit(s):

Emission unit 1SSISP - This emission unit consists of two seven-hearth furnaces (MHF01 and MHF02) that incinerate sewage sludge generated from the treatment of municipal wastewater received at the Albany County South Plant. Only one furnace is in operation at a given time. Each furnace is vented to a VenturiPak (TM) Scrubber System consisting of a quench stage, condenser stage, venturi, and high efficiency mist eliminator.

Emission unit 1SSISP is associated with the following emission points (EP):
00001, 00002

Process: INC is located at Building SOLIDS - Incineration of sewage sludge in two multiple hearth furnaces. Only one unit (either MHF01 or MHF02) is operated at any given time.

Emission unit 1GEN01 - This emission unit consists of one 1250 kW diesel-fired generator (DGEN1) that is used in a demand response program. The engine meets the definition of 'emergency generator' in 40 CFR 63 Subpart ZZZZ. This engine may be used for up to 100 hours per calendar year for operation in non-emergency situations, including maintenance and readiness testing and up to 50 hours per year in a demand response program. There is no limit on the time the generator is operated for emergency purposes.

Emission unit 1GEN01 is associated with the following emission points (EP):
00003

Process: GEN is located at Building GENERATOR - This process consists of the combustion of diesel fuel in a 1250 kW generator engine operated as an emergency engine.

Title V/Major Source Status

ALBANY COUNTY SEWER DISTRICT - SOUTH PLANT is subject to Title V requirements. This determination is based on the following information:

The Albany County Sewer District - South Plant is not a major source of any criteria contaminants. The facility is required to obtain a Title V permit because they operate two sewage sludge incinerators that are subject to the requirements of 40 CFR 60 Subpart MMMM.

Program Applicability

The following chart summarizes the applicability of ALBANY COUNTY SEWER DISTRICT - SOUTH PLANT with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability



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PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	YES
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229,



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230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code

Description

4953

REFUSE SYSTEMS

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code

Description

2-01-001-02

INTERNAL COMBUSTION ENGINES - ELECTRIC GENERATION
 ELECTRIC UTILITY INTERNAL COMBUSTION ENGINE - DISTILLATE OIL (DIESEL)
 Reciprocating

5-01-005-15

SOLID WASTE DISPOSAL - GOVERNMENT
 SOLID WASTE DISPOSAL: GOVERNMENT - OTHER
 INCINERATION
 Sludge: Multiple Hearth

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air



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contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount of material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN		> 0 but < 10 tpy
007440-38-2	ARSENIC		> 0 but < 10 tpy
007440-41-7	BERYLLIUM		> 0 but < 10 tpy
007440-43-9	CADMIUM		> 0 but < 10 tpy
000124-38-9	CARBON DIOXIDE		>= 250 tpy but < 75,000 tpy
0NY750-00-0	CARBON DIOXIDE EQUIVALENTS		>= 250 tpy but < 75,000 tpy
000630-08-0	CARBON MONOXIDE		>= 50 tpy but < 100 tpy
007440-47-3	CHROMIUM		> 0 but < 10 tpy
007647-01-0	HYDROGEN CHLORIDE		> 0 but < 10 tpy
007439-92-1	LEAD		> 0 but < 10 tpy
007439-97-6	MERCURY		> 0 but < 10 tpy
000074-82-8	METHANE		> 0 but < 2.5 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS		> 0 but < 10 tpy
010024-97-2	NITROUS OXIDE		> 0 but < 2.5 tpy
0NY210-00-0	OXIDES OF NITROGEN		>= 10 tpy but < 25 tpy
0NY075-00-0	PARTICULATES		>= 10 tpy but < 25 tpy
0NY075-02-5	PM 2.5		>= 10 tpy but < 25 tpy
0NY075-00-5	PM-10		>= 10 tpy but < 25 tpy
007446-09-5	SULFUR DIOXIDE		>= 10 tpy but < 25 tpy
0NY100-00-0	TOTAL HAP		> 0 but < 2.5 tpy
0NY998-00-0	VOC		>= 10 tpy but < 25 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.



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- (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 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 and maintained;
 - (3) During the period of the emergency the facility owner 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 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 or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 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 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)
Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(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.



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Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 201-6.4(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.4(a)(9)
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.4(g)
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.4(i)
This Title V permit shall be reopened and revised under any of the following circumstances:



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- 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 2 01-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

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

Item L: Permit Exclusion - ECL 19-0305

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

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

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

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**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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	80	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A	29	General provisions
FACILITY	40CFR 60-MMMM.5130	30	Trained Operators
1-SSISP	40CFR 60-MMMM.5135	49	Schedule for Operator Training
1-SSISP	40CFR 60-MMMM.5155	50	Procedures When Qualified Operators are Temporarily not Accessible
1-SSISP	40CFR 60-MMMM.5165	51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 79	Emission Limits, Emission Standards and Operating Limits
1-SSISP	40CFR 60-MMMM.5170(f)	63, 1 -1	Operating Limits and Requirements - Sludge Moisture
1-SSISP	40CFR 60-MMMM.5180	64	Application of Emission Limits, Standards, and Operating Limits During Startup, Shutdown, and Malfunction
1-SSISP	40CFR 60-MMMM.5185	65	Demonstration of Initial Compliance with Emission Limits and Standards
1-SSISP	40CFR 60-MMMM.5195	70	Schedule for Initial Air Pollution Control Device Inspection and Repairs
1-SSISP	40CFR 60-MMMM.5200	71	Site-specific monitoring plan
1-SSISP	40CFR 60-MMMM.5205	72	Demonstration of Continuous Compliance



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1-SSISP	40CFR 60- MMMM.5205(a)(3)	73							with Emission Limits and Standards
1-SSISP/-/INC/MHF01	40CFR 60-MMMM.5210	1	-3						Performance Testing Frequency
1-SSISP/-/INC/MHF02	40CFR 60-MMMM.5210	1	-4						Demonstration of Continuous Compliance With Operating Limits
1-SSISP/-/INC/VSCR1	40CFR 60-MMMM.5210	1	-5, 1	-6, 1	-7				Demonstration of Continuous Compliance With Operating Limits
1-SSISP/-/INC/VSCR2	40CFR 60-MMMM.5210	1	-8, 1	-9, 1	-10				Demonstration of Continuous Compliance With Operating Limits
1-SSISP	40CFR 60-MMMM.5215	74							Air Pollution Control Device Inspection and Repairs
1-SSISP	40CFR 60- MMMM.5225(a)(1)	1	-2						Monitoring and Calibration Requirements for Operating Limits
1-SSISP FACILITY	40CFR 60-MMMM.5230 40CFR 60-MMMM.5235(b)	75, 76 31							Recordkeeping Sewage Sludge Incineration - Initial Compliance Report
FACILITY	40CFR 60-MMMM.5235(c)	32							Sewage Sludge Incineration - Annual Compliance Report
FACILITY	40CFR 60-MMMM.5235(d)	33							Sewage Sludge Incineration - Deviation Reports
1-SSISP	40CFR 61-C.32(a)	77							Beryllium: extraction plants, ceramic plants, foundries, incinerators, propellant plants, machine shops-
1-SSISP	40CFR 61-E.52(b)	78							emission standard Standard for Mercury: Mercury Ore Processing, chlorine gas production, and sludge incineration-
1-GEN01	40CFR 63-ZZZZ.6603(a)	40							emission standard Reciprocating Internal Combustion Engine (RICE) NESHAP - requirements for existing engines at area sources of HAP emissions
FACILITY	40CFR 63-ZZZZ.6604	34							Reciprocating Internal Combustion Engine (RICE) NESHAP - Fuel requirements for CI RICE
1-GEN01	40CFR 63-ZZZZ.6625(e)	41							Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance of engine and control

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1-GEN01	40CFR 63-ZZZZ.6625(h)	42	device Reciprocating Internal Combustion Engine (RICE) NESHAP - idling time at startup
1-GEN01	40CFR 63-ZZZZ.6625(i)	43	Reciprocating Internal Combustion Engine (RICE) NESHAP - oil analysis program for compression ignition engines
FACILITY	40CFR 63-ZZZZ.6640(a)	35	Reciprocating Internal Combustion Engine (RICE) NESHAP - Compliance Requirements
1-GEN01	40CFR 63-ZZZZ.6640(b)	44	Reciprocating Internal Combustion Engine (RICE) NESHAP - deviations and catalyst changing
FACILITY	40CFR 63-ZZZZ.6640(f)	36	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency engines
1-GEN01	40CFR 63-ZZZZ.6650(h)	45	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency engine demand response reporting
1-GEN01	40CFR 63-ZZZZ.6655(a)	46	Reciprocating Internal Combustion Engine (RICE) NESHAP - records that must be kept
1-GEN01	40CFR 63-ZZZZ.6655(e)	47	Reciprocating Internal Combustion Engine (RICE) NESHAP - maintenance plan records that must be kept
1-GEN01	40CFR 63-ZZZZ.6655(f)	48	Reciprocating Internal Combustion Engine (RICE) NESHAP - Recordkeeping requirements
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	81	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of



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FACILITY	6NYCRR 201-3.2(a)	13	collected contaminants to the air
FACILITY	6NYCRR 201-3.3(a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	21, 37, 38	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.4(a)(4)	15	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)(2)	4	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201- 6.4(c)(3)(ii)	5	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(d)(4)	22	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(f)(6)	17	Compliance Certification
FACILITY	6NYCRR 202-1.1	18	Off Permit Changes
FACILITY	6NYCRR 202-2.1	7	Required emissions tests.
FACILITY	6NYCRR 202-2.5	8	Emission Statements - Applicability
FACILITY	6NYCRR 211.1	23	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 212.6(a)	24	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 215.2	9	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 225-1.2(f)	25	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(g)	26	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2(h)	27	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.6(f)	28	Sulfur-in-Fuel Limitations
1-GEN01	6NYCRR 227-1.3(a)	39	Excess Emission Reports Smoke Emission Limitations.

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the



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Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information



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that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be



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borne by the owner/operator of the source.

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

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.

40 CFR Part 68

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, ALBANY COUNTY SEWER DISTRICT - SOUTH PLANT has been determined to be subject to the following regulations:

40 CFR 60.5130

This section contains the operator training and qualification requirements for operators of sewage sludge incineration units.

40 CFR 60.5135

This section outlines the timeframes for completion of the required operator training course.

40 CFR 60.5155

This section describes the procedures the facility owner or operator must follow if all of the qualified operators are not available.

40 CFR 60.5165

This section describes the various emission limits that the owner or operator of a sewage sludge



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incinerator is required to meet in order to demonstrate compliance with Subpart Mmmm.

40 CFR 60.5170 (f)

This section requires the facility owner or operator to monitor certain characteristics of the sewage sludge fed to the incineration unit.

40 CFR 60.5180

This section states that the emission limits established under Subpart Mmmm apply at all times sewage sludge is present in the combustion chamber, including periods of start-up, shut down, and malfunction.

40 CFR 60.5185

This section describes how the owner or operator of a sewage sludge incineration unit must demonstrate initial compliance with the requirements of 40 CFR 60 Subpart Mmmm.

40 CFR 60.5195

This section outlines the timeframe for conducting the initial air pollution control device inspection.

40 CFR 60.5200

This section requires the owner or operator of a Sewage Sludge Incineration (SSI) unit to develop and implement a site-specific monitoring plan for the SSI unit.

40 CFR 60.5205

This section describes the methods that the owner or operator of a sewage sludge incineration unit must use to demonstrate continuous compliance with the standards and limitations of 40 CFR 60 Subpart Mmmm.

40 CFR 60.5205 (a) (3)

This section describes when the owner or operator of a sewage sludge incineration unit may conduct performance testing at a reduced frequency.

40 CFR 60.5210

This section describes the methods the facility owner or operator must use to demonstrate continuous compliance with the operating limits established according to 40 CFR 60 Subpart Mmmm.

40 CFR 60.5215



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This section requires that the facility owner or operator to conduct an annual inspection of the air pollution control device(s) installed at the facility and make any necessary repairs.

40 CFR 60.5225 (a) (1)

This section describes the requirements for operating, maintaining, and calibrating the continuous monitoring systems required by 40 CFR 60 Subpart Mmmm.

40 CFR 60.5230

This section describes the type and format of records that the owner or operator of a sewage sludge incinerator must keep in order to demonstrate compliance with 40 CFR 60 Subpart Mmmm.

40 CFR 60.5235 (b)

This section requires the facility owner or operator to submit an initial compliance report to the Department.

40 CFR 60.5235 (c)

This section requires the facility owner or operator to submit annual compliance reports to the Department.

40 CFR 60.5235 (d)

This section requires the facility owner or operator to submit semiannual deviation reports to the Department.

40 CFR 61.32 (a)

This condition sets a facility specific emission limitation for Beryllium. The facility owner or operator is required to conduct periodic emissions testing in order to demonstrate compliance with this limit.

40 CFR 61.52 (b)

This regulation sets the standard for mercury emissions from sludge incineration plants and/or sludge drying plants that process wastewater treatment plant sludges. The emission standard is less than 3,200 grams of mercury per day.

40 CFR 63.6603 (a)

These conditions list the emission limits, operating limits, and work practices that existing engines located at an area source of HAP emissions must meet.

The engines must meet work practices, emission limits, and operating limits on carbon monoxide or



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formaldehyde for the specific type of engine listed in table 2d of subpart ZZZZ.

40 CFR 63.6604

These conditions state the fuel requirements for compression ignition engines that uses diesel fuel.

40 CFR 63.6625 (e)

This regulation requires the owners or operator of an existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions, an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

40 CFR 63.6625 (h)

This regulation requires the owner or operator of a reciprocating internal combustion engine, operating at a major source of hazardous air pollutants, to minimize the idling time of the engine at startup. Startup time is limited to 30 minutes or less.

40 CFR 63.6625 (i)

This condition allows compression ignition engines subject to work practices to extend the length of time between oil changes.

40 CFR 63.6640 (a)

This condition reduces the emissions of hazardous air pollutants from reciprocating internal combustion engines (RICE) by listing what the facility has to do to prove that it is continuously meeting the emission limits listed in this rule.

When the facility conducted the performance test to measure the emissions of pollutants during normal engine operation, the facility had to either install a device to continuously measure these emissions or measure parameters which are representative of what the emissions would be during operation of the engine. Then this information must be submitted to the NYSDEC so that DEC can tell from the compliance reports whether the emission limits are being met.

40 CFR 63.6640 (b)

This condition specifies what the facility needs to do in the event that the results of the monitoring show that the facility was not meeting the emission limits in this rule. This is called a deviation from the emission limits and/or operating limits of this rule and must be reported to NYSDEC.

This condition also requires the facility to conduct another performance test and re-establish the operating



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parameters if the catalyst in the control device is changed.

40 CFR 63.6640 (f)

This condition states the operating requirements for emergency engines.

40 CFR 63.6650 (h)

This condition states the reporting requirements for emergency engines that operate for demand response.

40 CFR 63.6655 (a)

This regulation sets forth the record keeping requirements for owners or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 63.6655 (e)

This regulation sets forth the record keeping requirements for RICE subject to facility specific maintenance plans.

40 CFR 63.6655 (f)

This regulation requires the owner/operator of a reciprocating internal combustion engine to record the number of hours the engine has been used, in both emergency and non-emergency use.

40 CFR Part 60, Subpart A

This regulation contains the General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements

6 NYCRR 211.1

This regulation requires that 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.

6 NYCRR 212.6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.



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6 NYCRR 225-1.2 (f)

Sulfur-in-fuel limitations for the purchase of #2 heating oil on or after July 1, 2012.

6 NYCRR 225-1.2 (g)

Sulfur-in-fuel limitations for the purchase of distillate oil on or after July 1, 2014.

6 NYCRR 225-1.2 (h)

Sulfur-in-fuel limitation for the firing of distillate oil on or after July 1, 2016.

6 NYCRR 225-1.6 (f)

This citation requires subject facilities to submit excess emissions reports to the Department.

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

Compliance Certification

Summary of monitoring activities at ALBANY COUNTY SEWER DISTRICT - SOUTH PLANT:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	30	record keeping/maintenance procedures
1-SSISP	50	record keeping/maintenance procedures
1-SSISP	51	intermittent emission testing
1-SSISP	52	intermittent emission testing
1-SSISP	53	intermittent emission testing
1-SSISP	54	intermittent emission testing
1-SSISP	55	monitoring of process or control device parameters as surrogate
1-SSISP	56	intermittent emission testing
1-SSISP	57	intermittent emission testing
1-SSISP	58	intermittent emission testing
1-SSISP	59	intermittent emission testing
1-SSISP	60	intermittent emission testing
1-SSISP	61	intermittent emission testing
1-SSISP	1-1	record keeping/maintenance procedures
1-SSISP	63	record keeping/maintenance procedures
1-SSISP	65	record keeping/maintenance procedures
1-SSISP	71	record keeping/maintenance procedures
1-SSISP	73	record keeping/maintenance procedures
1-SSISP/-/INC/MHF01	1-3	continuous emission monitoring (cem)
1-SSISP/-/INC/MHF02	1-4	continuous emission monitoring (cem)
1-SSISP/-/INC/VSCR1	1-5	continuous emission monitoring (cem)



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1-SSISP/-/INC/VSCR1	1-6	continuous emission monitoring (cem)
1-SSISP/-/INC/VSCR1	1-7	continuous emission monitoring (cem)
1-SSISP/-/INC/VSCR2	1-8	continuous emission monitoring (cem)
1-SSISP/-/INC/VSCR2	1-9	continuous emission monitoring (cem)
1-SSISP/-/INC/VSCR2	1-10	continuous emission monitoring (cem)
1-SSISP	74	record keeping/maintenance procedures
1-SSISP	1-2	record keeping/maintenance procedures
1-SSISP	75	record keeping/maintenance procedures
1-SSISP	76	record keeping/maintenance procedures
FACILITY	32	record keeping/maintenance procedures
FACILITY	33	record keeping/maintenance procedures
1-SSISP	77	intermittent emission testing
1-SSISP	78	intermittent emission testing
1-GEN01	40	record keeping/maintenance procedures
1-GEN01	41	record keeping/maintenance procedures
1-GEN01	42	monitoring of process or control device parameters as surrogate
1-GEN01	43	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
1-GEN01	45	record keeping/maintenance procedures
1-GEN01	46	record keeping/maintenance procedures
1-GEN01	47	record keeping/maintenance procedures
1-GEN01	48	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures
FACILITY	25	work practice involving specific operations
FACILITY	26	work practice involving specific operations
FACILITY	27	work practice involving specific operations
FACILITY	28	record keeping/maintenance procedures
1-GEN01	39	monitoring of process or control device parameters as surrogate

Basis for Monitoring

40 CFR 60 Subpart Mmmm (Subpart Mmmm) requires the owner or operator of a sewage sludge incinerator to establish various operating limits during the facility’s initial performance test. Once established, the facility must continuously monitor each parameter to demonstrate compliance with the requirements of Subpart Mmmm. Since the Albany County Sewer District – South Plant operates two separate incinerators, the facility has established a separate set of operating parameters for each unit as part of their initial performance test.

The Albany County Sewer District – South Plant was required to establish the following operating parameter limits:

1. Minimum combustion chamber temperature. This limit is important to ensure that the incinerator is achieving good combustion of the sewage sludge. A temperature below the minimum value is an indicator of poor combustion, which may lead to an increase in emissions.
2. Minimum pressure drop across the wet scrubber. A pressure drop below the minimum value is an indicator that exhaust gases are moving through the scrubber too quickly, potentially reducing the control efficiency of the unit.



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3. Minimum wet scrubber water flow rate. A scrubber water flow rate below the minimum value is an indicator that the exhaust gases are not contacting the amount of water necessary to adequately control emissions, potentially reducing the control efficiency of the unit.
4. Minimum scrubber liquid exit pH. A scrubber exit pH below the minimum value is an indicator that the scrubber liquid is too acidic, which may indicate an increased amount of acid gases in the incinerator exhaust gas or a problem with the scrubber itself.

Each of these limits is monitored by a continuous parameter monitoring system, which must record a value once every 15 minutes. Four 15-minute readings are averaged into a 1-hour block average, and 12 1-hour block averages are averaged into a single 12-hour block average, which is used to demonstrate compliance. For pH, the facility must demonstrate compliance over a 3-hour block average instead of a 12-hour block average in order to account for the slow response time of pH to process changes.

Should any of the 15 minute readings or calculated averages fall below the specified limits, the facility must prepare a deviation report and submit it to the Department on a semiannual basis.