



**New York State Department of Environmental Conservation
Permit Review Report**

**Permit ID: 5-4138-00014/00018
06/08/2015**

Facility Identification Data

Name: SARATOGA CO SEWER DIST #1
Address: 1002 HUDSON RIVER RD
MECHANICVILLE, NY 12118

Owner/Firm

Name: SARATOGA COUNTY
Address: 40 MC MASTER ST
BALLSTON SPA, NY 12020-1907, USA
Owner Classification: Municipal

Permit Contacts

Division of Environmental Permits:
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Division of Air Resources:
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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

Application for initial Title V Permit as required by 40 CFR Part 60, Subpart M, Emission Guidelines and Compliance Times for Existing Sewage Sludge Incineration Units.

Attainment Status

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SARATOGA CO SEWER DIST #1 is located in the town of HALFMOON in the county of SARATOGA. 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:

The Saratoga County Sewer District No.1 municipal wastewater treatment plant will be capable of treating 43 million gpd (gallons per day) of raw sewage from the surrounding areas including residential, commercial, and industrial. The plant consists of influent channels, bar screens, primary and secondary settling tanks, aeration tanks, sludge storage tanks, ash dewatering tanks, chlorine contact tanks, and a sludge incinerator.

Permit Structure and Description of Operations

The Title V permit for SARATOGA CO SEWER DIST #1 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). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of 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 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



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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.

SARATOGA CO SEWER DIST #1 is defined by the following emission unit(s):

Emission unit 100001 - The Saratoga County Sewer District No.1 wastewater treatment plant operates a fluidized bed sludge incinerator and an odor control scrubber. When the incineration is in operation, the room housing the filter press and sludge storage tanks is vented to the incinerator for odor control. When the incinerator is not in operation, the room is vented directly to a scrubber.

Emission unit 100001 is associated with the following emission points (EP):
00001, 00005

Process: COM Combustion process to incinerate sludge from the wastewater treatment plant. The process also includes odor control for the sludge drying room as the room is exhausted to the incinerator. The room houses two sludge presses (only one is operated at a time) and four sludge tanks. The incinerator exhausts to a scrubber.

Process: DRY Sludge is dried prior to incineration with a sewage sludge press. For odor control, the room is exhausted through a scrubber (when the incinerator is not in operation). The room houses two sludge presses (only one is operated at a time) and four sludge tanks.

Emission unit 100002 - The wastewater is treated by using grit separation, diffused air aeration units, and settling tanks. The grit and screening emissions are exhausted through a biofilter for odor control. Influent to the three of primary settling tanks is exhausted through a carbon filter for odor control.

Emission unit 100002 is associated with the following emission points (EP):
00004, 00006, 00008

Process: WWT The wastewater is treated by using grit separation, diffused air aeration units, and settling tanks. The grit and screening emissions are exhausted through a biofilter for odor control. Influent to the primary settling tanks 1, 2, and 3 is exhausted without control. Influent to primary tanks 4, 5, and 6 is vented to a carbon filter for odor control.

Title V/Major Source Status

SARATOGA CO SEWER DIST #1 is subject to Title V requirements. This determination is based on the following information:

In accordance with 40 CFR 60.5240, SCSD #1 is required to obtain a Title V facility permit because it operates a sewage sludge incinerator unit. The facility is not major for any air contaminants.

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Program Applicability

The following chart summarizes the applicability of SARATOGA CO SEWER DIST #1 with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
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	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - 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 Part 231) - 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) - 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) - 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) - 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



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the regulation.

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

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - 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, 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) - 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

4952

SEWERAGE 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

3-01-825-04

CHEMICAL MANUFACTURING
CHEMICAL MANUFACTURING - WASTEWATER, POINTS OF GENERATION
WASTEWATER: TNT-FINISHING OPERATION FUME SCRUBBER

5-01-007-92

SOLID WASTE DISPOSAL - GOVERNMENT

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5-02-005-16

SOLID WASTE DISPOSAL: GOVERNMENT - SEWAGE
TREATMENT
POTW: SLUDGE CENTRIFUGE
SOLID WASTE DISPOSAL -
COMMERCIAL/ INSTITUTIONAL
SOLID WASTE DISPOSAL: COMMERCIAL -
INCINERATION: SPECIAL PURPOSE
SEWAGE SLUDGE INCINERATOR: FLUIDIZED BED

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 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 or 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
000079-34-5	1,1,2,2-TETRACHLOROETHANE	> 0	but < 10 tpy
000107-06-2	1,2-DICHLOROETHANE	> 0	but < 10 tpy
000542-75-6	1-PROPENE, 1,3-DICHLORO-	> 0	but < 10 tpy
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN	> 0	but < 10 tpy
007440-38-2	ARSENIC	> 0	but < 10 tpy
000071-43-2	BENZENE	> 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	>= 10 tpy	but < 25 tpy
000108-90-7	CHLOROBENZENE	> 0	but < 10 tpy
000067-66-3	CHLOROFORM	> 0	but < 10 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO	> 0	but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO	> 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



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000074-82-8	METHANE	> 0 but < 2.5 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	> 0 but < 10 tpy
010102-44-0	NITROGEN DIOXIDE	> 0 but < 2.5 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 50 tpy but < 100 tpy
0NY075-00-0	PARTICULATES	>= 2.5 tpy but < 10 tpy
000062-73-7	PHOSPHORIC ACID, 2,2- DICHLOROETHENYL DIMETHYL ESTER	> 0 but < 10 tpy
0NY075-02-5	PM 2.5	>= 2.5 tpy but < 10 tpy
0NY075-00-5	PM-10	>= 2.5 tpy but < 10 tpy
000078-87-5	PROPANE, 1,2-DICHLORO	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 10 tpy but < 25 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
0NY100-00-0	TOTAL HAP	>= 10 tpy but < 25 tpy
0NY998-00-0	VOC	>= 25 tpy but < 40 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.

(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



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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.

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.

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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:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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



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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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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
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FACILITY	ECL 19-0301	81	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A	32	General provisions
FACILITY	40CFR 60-IIII	33	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
FACILITY	40CFR 60-MMMM.5130	34	Trained Operators
1-00001	40CFR 60-MMMM.5135	51	Schedule for Operator Training
1-00001	40CFR 60-MMMM.5155	52	Procedures When Qualified Operators are Temporarily not Accessible
1-00001	40CFR 60-MMMM.5160	53	Operator Review of Site-Specific Documentation
1-00001	40CFR 60-MMMM.5165	54, 55, 56, 57, 58, 59, 60, 61, 62, 63	Emission Limits, Emission Standards and Operating Limits
1-00001	40CFR 60-MMMM.5170 (f)	64, 65	Operating Limits and Requirements - Sludge Moisture
1-00001	40CFR 60-MMMM.5180	66	Application of Emission Limits, Standards, and Operating Limits During Startup, Shutdown, and Malfunction
1-00001	40CFR 60-MMMM.5185	67	Demonstration of Initial Compliance with Emission Limits and Standards
1-00001	40CFR 60-MMMM.5190	68	Establishing Operating Limits
1-00001	40CFR 60-MMMM.5195	69	Schedule for Initial Air Pollution Control Device Inspection and Repairs
1-00001	40CFR 60-MMMM.5200	70	Site-specific monitoring plan
1-00001	40CFR 60-MMMM.5205	71	Demonstration of Continuous Compliance with Emission Limits and Standards
1-00001	40CFR 60-MMMM.5205 (a) (3)	72	Performance Testing Frequency
1-00001	40CFR 60-MMMM.5210	73	Demonstration of Continuous Compliance With Operating Limits
1-00001	40CFR 60-MMMM.5215	74	Air Pollution Control Device Inspection and Repairs
1-00001	40CFR 60-MMMM.5230	75	Recordkeeping
FACILITY	40CFR 60-MMMM.5235 (b)	35	Sewage Sludge Incineration - Initial Compliance Report
1-00001	40CFR 60-MMMM.5235 (b)	76	Sewage Sludge

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FACILITY	40CFR 60-MMMM.5235 (c)	36	Incineration - Initial Compliance Report
FACILITY	40CFR 60-MMMM.5235 (d)	37	Sewage Sludge Incineration - Annual Compliance Report
1-00001/00001	40CFR 60-O.152 (a) (1)	79	Sewage Sludge Incineration - Deviation Reports
1-00001/00001	40CFR 60-O.152 (a) (2)	80	Standards of Performance for Sewage Treatment Plants - standard for particulate matter
1-00001	40CFR 60-O.153 (a)	45	Standards of Performance for Sewage Treatment Plants - standard for particulate matter
1-00001	40CFR 60-O.153 (b) (1)	46	Standards of Performance for Sewage Treatment Plants - monitoring of operations
1-00001	40CFR 60-O.153 (b) (2)	47	Standards of Performance for Sewage Treatment Plants - monitoring of scrubber pressure drop.
1-00001	40CFR 60-O.153 (b) (3)	48	Standards of Performance for Sewage Treatment Plants - monitoring of exhaust gas oxygen content.
1-00001	40CFR 60-O.153 (b) (4)	49	Standards of Performance for Sewage Treatment Plants - monitoring of operations
1-00001	40CFR 60-O.155 (a)	50	Standards of Performance for Sewage Treatment Plants - test methods and procedures
1-00001	40CFR 61-C.32 (a)	77	Beryllium: extraction plants, ceramic plants, foundries, incinerators, propellant plants, machine shops-
1-00001	40CFR 61-E.52 (b)	78	emission standard Standard for Mercury: Mercury Ore Processing, chlorine gas production, and sludge incineration- emission standard



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FACILITY	40CFR 63-CCCCC.11115	38	General duties to minimize emissions
FACILITY	40CFR 63-CCCCC.11116	39	Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline
FACILITY	40CFR 63-JJJJJJ	40	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
FACILITY	40CFR 63-ZZZZ	41	Reciprocating Internal Combustion Engine (RICE) NESHP
FACILITY	40CFR 68	18	Chemical accident prevention provisions
FACILITY	40CFR 82-F	19	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	82	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	20, 42, 43	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	21	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification



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FACILITY	6NYCRR 201-6.4 (f) (6)	17	Off Permit Changes
FACILITY	6NYCRR 202-1.1	22	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	23	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 212.4 (a)	24	General Process Emission Sources - emissions from new sources and/or modifications
FACILITY	6NYCRR 212.6 (a)	25	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
1-00001	6NYCRR 219-9.3 (b) (5)	44	Extended compliance schedule
FACILITY	6NYCRR 225-1.2 (f)	26	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2 (g)	27	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.2 (h)	28	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 225-1.6 (d)	29	Record Availability
FACILITY	6NYCRR 225-1.6 (f)	30	Excess Emission Reports
FACILITY	6NYCRR 230.5	31	Gasoline dispensing sites - recordkeeping and reporting.

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 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.



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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 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



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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 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 there applicability thresholds and sets the requirements for



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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, SARATOGA CO SEWER DIST #1 has been determined to be subject to the following regulations:

40 CFR 60.152 (a) (1)

This condition details the monitoring requirements for meeting the particulate emissions limit of 0.65 g/kg dry sludge input (1.30 lb/ton dry sludge input).

40 CFR 60.152 (a) (2)

This condition states that particulate emissions may not exceed 20 percent opacity.

40 CFR 60.153 (a)

40 CFR 60.153 (b) (1)

This condition requires a facility with an incinerator equipped with a wet scrubbing device to install, calibrate, maintain and operate a monitoring device that continuously measures and records the pressure drop of the gas flow through the wet scrubbing device.

40 CFR 60.153 (b) (2)

This condition requires the owner or operator of a sludge incinerator to install, calibrate, maintain and operate a monitoring device that continuously measures and records the oxygen content of the incinerator exhaust gas.

40 CFR 60.153 (b) (3)

This condition requires the owner or operator of a sludge incinerator to install, calibrate, maintain and operate temperature measuring devices. It describes the locations and number of temperature monitoring devices to be installed and how they are to be operated.

40 CFR 60.153 (b) (4)

This condition states that the owner or operator must install, calibrate, maintain and operate a device for measuring the fuel flow to the incinerator and meet certain parameters of operation.



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40 CFR 60.155 (a)

40 CFR 60.5130

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

40 CFR 60.5135

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 60.5160

Operator Review of Site-Specific Documentation

40 CFR 60.5165

This section describes the various emission limits that the owner or operator of a sewage sludge incinerator is required to meet in order to demonstrate compliance with Subpart M MMM.

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 M MMM 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 M MMM.



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40 CFR 60.5190

40 CFR 60.5195

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 M 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

40 CFR 60.5215

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 60.5230

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 M MMMM.



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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)

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 63.11115

40 CFR 63.11116

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

40 CFR Part 60, Subpart IIII

40 CFR Part 63, Subpart JJJJJ

This regulation covers facilities that own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as



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defined in §63.2, except as specified in §63.11195.

40 CFR Part 63, Subpart ZZZZ

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 212.4 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

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.

6 NYCRR 219-9.3 (b) (5)

The section establishes final compliance date of March 21, 2016.

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 (d)

This citation requires subject facilities make their records available to the Department for inspection.

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6 NYCRR 225-1.6 (f)

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

6 NYCRR 230.5

Compliance Certification

Summary of monitoring activities at SARATOGA CO SEWER DIST #1:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	34	record keeping/maintenance procedures
1-00001	52	record keeping/maintenance procedures
1-00001	53	record keeping/maintenance procedures
1-00001	54	intermittent emission testing
1-00001	55	intermittent emission testing
1-00001	56	intermittent emission testing
1-00001	57	monitoring of process or control device parameters as surrogate
1-00001	58	intermittent emission testing
1-00001	59	intermittent emission testing
1-00001	60	intermittent emission testing
1-00001	61	intermittent emission testing
1-00001	62	intermittent emission testing
1-00001	63	intermittent emission testing
1-00001	64	record keeping/maintenance procedures
1-00001	65	record keeping/maintenance procedures
1-00001	66	record keeping/maintenance procedures
1-00001	67	record keeping/maintenance procedures
1-00001	68	record keeping/maintenance procedures
1-00001	69	record keeping/maintenance procedures
1-00001	70	record keeping/maintenance procedures
1-00001	72	record keeping/maintenance procedures
1-00001	73	record keeping/maintenance procedures
1-00001	74	record keeping/maintenance procedures
1-00001	75	record keeping/maintenance procedures
1-00001	76	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
1-00001/00001	79	intermittent emission testing
1-00001/00001	80	monitoring of process or control device parameters as surrogate
1-00001	45	record keeping/maintenance procedures
1-00001	46	record keeping/maintenance procedures
1-00001	47	record keeping/maintenance procedures
1-00001	48	record keeping/maintenance procedures
1-00001	49	record keeping/maintenance procedures
1-00001	50	record keeping/maintenance procedures
1-00001	77	intermittent emission testing
1-00001	78	intermittent emission testing
FACILITY	38	record keeping/maintenance procedures



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FACILITY	39	record keeping/maintenance procedures
FACILITY	41	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
1-00001	44	record keeping/maintenance procedures
FACILITY	26	work practice involving specific operations
FACILITY	27	work practice involving specific operations
FACILITY	28	work practice involving specific operations
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures

Basis for Monitoring

Federal Emission Guideline for existing Sewage Sludge incinerators (40 CFR 60 Subpart MMMM) - This Federal guideline took effect in 2011 and establishes limits for control of emissions from existing large Sewage Sludge incineration (SSI) units. The NYSDEC adopted this rule by reference in 6 NYCRR Part 200, effective 3/12/12. The following is a discussion of emission limits and standards in accordance with this rule.

Regulatory Emission Limits – Subpart MMMM establishes specific emission limits for various regulated pollutants. The rule specifies the testing procedures, testing frequency, calculations methods, recordkeeping and reporting procedures used to determine compliance.

Annual Stack Testing - required for emissions of Particulates, Carbon Monoxide, Oxides of Nitrogen, Sulfur Dioxide, Hydrogen Chloride, Mercury, Lead, Cadmium, and Dioxins/furans. The annual stack test report must be received by the Department within 60 days of completion of testing. The requirement for annual stack testing may be extended to every third year, based on certain provisions in this rule.

Continuous Emission Monitors - continuous compliance using a continuous emissions monitoring system or continuous automated sampling system may be used in lieu of annual testing, as specified in this rule. At the time of Title V permit issuance, SCSD #1 does not intend to use this method for the demonstrating compliance with this rule.

Operating Limits – site-specific operating limits are established during performance testing, for scrubbers used to control particulate matter, lead, cadmium, hydrogen chloride, and sulfur dioxide. These parameters include: the scrubber’s pressure drop, liquid flow rate, liquid pH; combustion chamber’s operating temperature; and sludge feed rate and moisture content. These operating parameters are monitored to demonstrate continuous compliance with the emission limitations.

Reports –



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Initial Compliance Report - includes the initial performance test report, continuous monitoring system (CMS) performance evaluation, site-specific operating limits and calculations and methods used to establish operating limits, initial control device inspection, site-specific monitoring and ash handling system plans

Annual Compliance Report – including performance tests reports, CMS evaluation and results, annual pollution control inspections, monitoring plan revisions, operator training and staffing status.

Deviation Report – is a semiannual report describing in detail deviations from emission limits, emission standards, and operating limits. In addition any deviations from the requirement to have qualified operator accessible, for two weeks or more, requires notification within 10 days of deviation.

Site-Specific Inspections/Procedures-

Facility CMS Monitoring and Performance Evaluations, Air Pollution Device Inspections, and Operator Training Procedures and Records - The facility must maintain and update these site-specific procedures in accordance with Subpart M MMM

Qualified Operator – an accessible qualified operator must be available during all periods of operation. However, Subpart M MMM specifies operating and reporting procedures in the event a qualified operator is unavailable. Certification is done through the State's certification program. Requirements for certification, annual renewal, and recordkeeping are specified in Subpart M MMM.

Fugitive Ash Emissions -the presence of any visible emissions from ash handling operations at the facility are limited to less than 5% of a three hour observation period. A compliance demonstration for this is required annually.

Startup/Shutdown/Malfunctions - emission limits and standards apply at all times and during periods of malfunction. Subpart M MMM, specifies time frame and elements necessary to assert an affirmative defense for malfunctions.

Federal Emission Standards of Performance for Sewage Treatment Plants (40 CFR 60 Subpart O) - This Federal standard took effect in 1971 and establishes limits for control of emissions from incinerators that combusts waste containing more than 10 percent sewage sludge. The following is a discussion of emission limits and standards in accordance with this rule.

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Regulatory Emission Limits-

Stack testing - this rule limits particulate to 1.30 lb/ton dry sludge input and opacity of less than 20 percent. The rule specifies the testing frequency, test methods, calculations, sampling procedures, recordkeeping and reporting requirements for performance testing and continuous compliance.

Parametric Monitoring - this rule requires the installation, maintenance, and operation of continuous sewage sludge flow and fuel measuring devices, combustion chamber temperature monitors, as well as a scrubber pressure drop and oxygen content monitors.

Since past performance tests indicate that particulate emission are less than or equal to .75 lb/ton dry sludge input, SCSD is not required to continuously monitor sewage sludge flow, fuel flow and combustion chamber temperature (however temperature is required under Subpart MMMM).

Reports – SCSD #1 shall submit reports identifying continuous pressure drop and oxygen content monitoring that are in excess of levels established during the most recent particulate performance testing. The pressure drop reporting level is established at 30 percent less, and oxygen content at 3 percent greater than the averages measured during the most recent performance test. Reporting requirements are also based on particulate emission rates remaining less than or equal to .75 lb/ton dry sludge input.

National Emission Standards for Beryllium and Mercury (40 CFR 61, Subparts C & E)

Regulatory Emission Limits - Federal standards, Subpart C & E, specify emission limitations for Beryllium and Mercury, respectively. SCSD #1 is required to conduct periodic emissions testing in order to demonstrate compliance with this limit. Compliance with the Mercury limit may be demonstrated based on quantities measured in the sludge.

Reports – results are reported semiannually.

NYS Rules and Regulations for General Process Emission Sources (6 NYCRR Part 212)

Regulatory Emission Limits - NYS regulation requires SCSD #1 not cause or allow emissions of 20% or greater opacity from any process emission source. Opacity is not likely to occur from the permitted sources due to the wet nature of these operations.



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Reports – results are reported semiannually.

NYS Rules and Regulations for General Process Emission Sources (6 NYCRR Part 225)

Regulatory Emission Limits - NYS regulation requires SCSD #1 purchase only No. 2 heating oil or other distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2012 and July 1, 2014, respectively. In addition, SCSD #1 may only fire distillate oil including No. 2 heating oil with 0.0015 percent sulfur by weight or less on or after July 1, 2016. SCSD #1 is required to maintain and retain records pursuant to this Subpart.

Reports - SCSD #1 must furnish to the department such records and summaries, on a semiannual calendar basis, or upon request.