



**Facility Identification Data**

Name: DANC SOLID WASTE MANAGEMENT FACILITY  
Address: 23400 ST RTE 177  
RODMAN, NY 13682

**Owner/Firm**

Name: DEVELOPMENT AUTHORITY OF THE NORTH COUNTRY  
Address: DULLES STATE OFFICE BLDG  
317 WASHINGTON ST  
WATERTOWN, NY 13601-3744, USA  
Owner Classification: State

**Permit Contacts**

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Air Permitting Contact:  
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RODMAN, NY 13682  
Phone:1352323236

**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**

The Department has initiated a modification to the Title V permit for the DANC Solid Waste Management Facility to allow the facility to participate in a coordinated demand reduction program (CDRP). This will allow the facility to operate two engine generator sets to provide power to the facility during non-emergency situations to help reduce load on the power grid during potential blackout periods.



**Attainment Status**

DANC SOLID WASTE MANAGEMENT FACILITY is located in the town of RODMAN in the county of JEFFERSON.

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 Solid Waste Management Facility is a landfill permitted pursuant to 6 NYCRR Part 360 that commenced receiving was in 1992. The facility currently utilizes a landfill gas collection and control system for controlling off-site odors. The main control is a large flare that burns landfill gas from the collection and control system. In the near future the collected landfill gas will be piped to a separate facility (Innovative Energy Systems - IES) that will burn the landfill gas in internal combustion engines and sell the generated power to the grid. The large flare will remain as a backup in case the IES engines are unable to accept the landfill gas. The facility also operates up to 8 candlestick flares for additional control of landfill gas odors as needed.

The facility also operates exempt and trivial activities including emergency generators, fuel storage tanks, building heaters, waste oil storage, and mobile equipment. The Department has initiated a modification to the Title V permit for the DANC Solid Waste Management Facility to allow the facility to participate in a coordinated demand reduction program (CDRP). This will allow the facility to operate two engine generator sets to provide power to the facility during non-emergency situations to help reduce load on the power grid during potential blackout periods.

**Permit Structure and Description of Operations**

The Title V permit for DANC SOLID WASTE MANAGEMENT FACILITY 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
  - 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.

DANC SOLID WASTE MANAGEMENT FACILITY is defined by the following emission unit(s):

Emission unit 4GENST - This emission unit consists of two engine generator sets (Onan Model 80DGDA & Olympian Model D200P1) that may be used as part of a coordinated demand reduction program (CDRP). Any other use will only be on an emergency basis.

It is further defined by the following process(es):

Process: 003Generation of facility power by 2 diesel engine generator sets as part of a coordinated demand reduction program (CDRP).

Emission unit 1LFGAS - This emission unit consists of landfilled waste generating landfill gas by anaerobic decomposition. The emission unit consists of one (1) main candlestick flare and up to eight (8) smaller portable, passive candlestick flares defined as emissions sources and emission points. This minor modification is to add one (1) open candlestick flare to the emission unit. The flare is designated as a new emission source and emission point. Landfill gas not captured by the facility's gas collection and control system is released as fugitive emissions.

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

00001, 00002, 00003, 00004, 00005, 00006, 00007, 00008, 00010, 00999

It is further defined by the following process(es):

Process: 001This process consists of landfilled waste generating landfill gas by decomposition and the control of the landfill gas emissions by flaring landfill gas collected from the landfill via gas collection wells.

Emission unit 3LCHST - This unit consists of one 2.5 million gallon concrete open-topped leachate storage tank.

It is further defined by the following process(es):

Process: 002Landfill leachate is collected and stored in a 2.5 million gallon concrete open-topped storage tank prior to removal and shipment to a water treatment facility.

#### **Title V/Major Source Status**

DANC SOLID WASTE MANAGEMENT FACILITY is subject to Title V requirements. This determination is based on the following information:

This facility is required to get a Title V permit by 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills. The regulation requires that any facility constructed or modified after May 30, 1991, with a design capacity equal to or greater than 2.5 million cubic meters, to apply for an receive a Title V permit regardless of emission levels.

#### **Program Applicability**



The following chart summarizes the applicability of DANC SOLID WASTE MANAGEMENT FACILITY 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)	NO
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
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 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
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)



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2-04-003-04      Reciprocating  
INTERNAL COMBUSTION ENGINES - ENGINE TESTING  
INTERNAL COMBUSTION ENGINE: ENGINE TESTING -  
TURBINE

5-01-004-06      LANDFILL GAS  
SOLID WASTE DISPOSAL - GOVERNMENT  
SOLID WASTE DISPOSAL: GOVERNMENT - LANDFILL DUMP  
LANDFILL GAS COLLECTION SYSTEM: OTHER

5-03-006-02      SOLID WASTE DISPOSAL - INDUSTRIAL  
SOLID WASTE DISPOSAL: INDUSTRIAL - LANDFILL DUMP  
Liquid Waste Disposal

## Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series 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		Range	-
		lbs/yr			
000079-34-5	1,1,2,2-TETRACHLOROETHANE		110000		Y
000107-06-2	1,2-DICHLOROETHANE	pteyear		Y	
000108-10-1	2-PENTANONE, 4-METHYL	pteyear		Y	
000071-43-2	BENZENE	pteyear		Y	
000106-46-7	BENZENE, 1,4-DICHLORO-	pteyear		Y	
000075-15-0	CARBON DISULFIDE	pteyear		Y	
000630-08-0	CARBON MONOXIDE	pteyear		G	
000056-23-5	CARBON TETRACHLORIDE	pteyear		Y	
000463-58-1	CARBONYL SULFIDE	pteyear		Y	
000108-90-7	CHLOROBENZENE	pteyear		Y	
000067-66-3	CHLOROFORM	pteyear		Y	
000075-09-2	DICHLOROMETHANE	pteyear		Y	
000075-34-3	ETHANE, 1,1-DICHLORO-	pteyear		Y	
000075-00-3	ETHANE, CHLORO	pteyear		Y	
000075-35-4	ETHENE, 1,1-DICHLORO	pteyear		Y	
000100-41-4	ETHYLBENZENE	pteyear		Y	
0NY100-00-0	HAP	pteyear		A	
000110-54-3	HEXANE	pteyear		Y	
007439-92-1	LEAD	pteyear		Y	
007439-97-6	MERCURY	pteyear		Y	
000074-82-8	METHANE	pteyear		H	
000078-93-3	METHYL ETHYL KETONE	pteyear		A	
0NY998-20-0	NMOC - LANDFILL USE ONLY	pteyear			
0NY210-00-0	OXIDES OF NITROGEN	pteyear		B	
0NY075-00-0	PARTICULATES	pteyear		B	
000127-18-4	PERCHLOROETHYLENE	pteyear		Y	
0NY075-00-5	PM-10	pteyear		B	



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000078-87-5	PROPANE, 1,2-DICHLORO	pteyear	Y
000107-13-1	PROPENENITRILE	pteyear	Y
007446-09-5	SULFUR DIOXIDE	pteyear	B
000108-88-3	TOLUENE	pteyear	Y
000079-01-6	TRICHLOROETHYLENE	pteyear	Y
000075-01-4	VINYL CHLORIDE	pteyear	Y
0NY998-00-0	VOC	pteyear	A
001330-20-7	XYLENE, M, O & P MIXT.	pteyear	Y

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: Emergency Defense - 6NYCRR Part 201-1.5**

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;



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

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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

**Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)**

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)**

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)**

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

**Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)**

This permit may be modified, revoked, reopened and reissued, or



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

**Item L: Permit Exclusion - ECL 19-0305**

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this



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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
FACILITY		53	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A.11 (d)	41	General provisions - compliance with standards and maintenance requirements
FACILITY	40CFR 60-A.12	42	General provisions - Circumvention
FACILITY	40CFR 60-A.14	43	General provisions - Modification



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1-LFGAS/-/001	40CFR 60-A.18 (c)	1-2	Control Device Requirements (Flares)
FACILITY	40CFR 60-A.4	29	General provisions - Address
FACILITY	40CFR 60-A.7 (b)	30	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (c)	31	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (d)	32	Notification and Recordkeeping
FACILITY	40CFR 60-A.7 (f)	33	Notification and Recordkeeping
FACILITY	40CFR 60-A.8 (b)	34, 35	
FACILITY	40CFR 60-A.8 (c)	36	
FACILITY	40CFR 60-A.8 (d)	37	
FACILITY	40CFR 60-A.8 (e)	38	
FACILITY	40CFR 60-A.8 (f)	39	
FACILITY	40CFR 60-A.9	40	General provisions - Availability of information
FACILITY	40CFR 60-WWW.752 (b) (2)	26	Standards for air emissions from MSW landfills
FACILITY	40CFR 60-WWW.754 (a) (1)	45	Calculation of Non-Methane Organic Carbon (NMOC) Emissions
FACILITY	40CFR 60-WWW.754 (a) (2)	46	
FACILITY	40CFR 60-WWW.754 (a) (3)	47	
FACILITY	40CFR 60-WWW.754 (a) (4)	48	
FACILITY	40CFR 60-WWW.754 (a) (5)	44	NMOC Calculation - Alternative Methods
FACILITY	40CFR 60-WWW.757 (b)	49	Reporting requirements - NMOC emission rate
FACILITY	40CFR 61-M.154	50	Standard for active waste disposal sites
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	
FACILITY	6NYCRR 201-1.4	54	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	
FACILITY	6NYCRR 201-1.8	1-1	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	23, 51, 52	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5 (a) (4)	15	
FACILITY	6NYCRR 201-6.5 (a) (7)	2	
FACILITY	6NYCRR 201-6.5 (a) (8)	16	
FACILITY	6NYCRR 201-6.5 (c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring



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FACILITY	6NYCRR 201-6.5 (d) (5)	17	
FACILITY	6NYCRR 201-6.5 (e)	6	
FACILITY	6NYCRR 201-6.5 (f) (6)	18	
FACILITY	6NYCRR 201-6.5 (g)	24	
FACILITY	6NYCRR 201-7.2	25, 26	Emissions capping using synthetic minor permits
FACILITY	6NYCRR 202-1.1	19	
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.3	27	Emission Statement - Required contents of an emission statement.
FACILITY	6NYCRR 202-2.4	28	Emission Statement - methods and procedures
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.2	55	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 215	9	
FACILITY	6NYCRR 217-3.2	56	
FACILITY	6NYCRR 217-3.3	57	
FACILITY	6NYCRR 225-1.2 (a) (2)	2-1	Sulfur in Fuel Limitations Post 12/31/87.
FACILITY	6NYCRR 225-1.8	2-2	Reports, sampling and analysis.
4-GENST/-/003/OLYM1	6NYCRR 227.2 (b) (1)	2-4	
FACILITY	6NYCRR 227-1.3 (a)	2-3	Smoke Emission Limitations.

**Applicability Discussion:**

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

ECL 19-301.

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.

6NYCRR Part 200-.6

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

6NYCRR Part 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

6NYCRR Part 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.



6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 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.

6NYCRR Part 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.

6NYCRR Part 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.

6NYCRR 201-6.5(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.

6NYCRR 201-6.5(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.



6NYCRR 201-6.5(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.

6NYCRR Part 201-6.5(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.

6NYCRR Part 201-6.5(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.

6NYCRR Part 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR Part 201-6.5(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.

6NYCRR 201-6.5(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.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.



6NYCRR Part 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.

6NYCRR Part 202-2.1

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

6NYCRR Part 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.

6NYCRR Part 211-2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

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, DANC SOLID WASTE MANAGEMENT FACILITY has been determined to be subject to the following regulations:



40CFR 60-A.11 (d)

This regulation specifies the type of opacity monitoring requirements in relation to compliance with the standards and maintenance requirements.

40CFR 60-A.12

This regulation prohibits an owner or operator from concealing emissions in violation of applicable standards by any means.

40CFR 60-A.14

This regulation defines the term modification and what is and is not considered to be a modification, for the purpose of rule applicability.

40CFR 60-A.18 (c)

This regulation specifies the operating parameters and testing methods used to operate and monitor a flare that is being used as an air pollution control device (as required by a new source performance standard).

40CFR 60-A.4

This condition lists the USEPA Region 2 address for the submittal of all communications to the "Administrator". In addition, all such communications must be copied to NYSDEC Bureau of Quality Assurance (BQA).

40CFR 60-A.7 (b)

This regulation requires the owner or operator to maintain records of the occurrence and duration of any startup, shutdown, or malfunction of the source or control equipment or continuous monitoring system.

40CFR 60-A.7 (c)

This requirement details the information to be submitted in excess emissions and monitoring systems performance reports which must be submitted at least semi-annually for sources with compliance monitoring systems.

40CFR 60-A.7 (d)

This condition specifies the required information and format for a summary report form and details when either a summary form and/or excess emissions reports are required.

40CFR 60-A.7 (f)

This condition specifies requirements for maintenance of files of all measurements, including continuous monitoring system (CMS), monitoring device, and performance testing measurements; all CMS performance evaluations; all CMS or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices for at least two years.

40CFR 60-A.8 (b)

This regulation contains the requirements for Performance test methods and procedures, to be used by the owner or operator, of the affected facility.

40CFR 60-A.8 (c)

This condition contains the requirements for operating conditions, of the emission source, during performance testing.

40CFR 60-A.8 (d)

This regulation contains the requirements for advance notification of Performance (stack) testing.



40CFR 60-A.8 (e)

This regulation requires the facility to provide appropriate sampling ports, safe platforms and utilities as necessary for Performance (stack) testing.

40CFR 60-A.8 (f)

This regulation requires that Performance (stack) tests consist of three runs unless otherwise specified. The rule also designates the allowable averaging methods for the analysis of the results.

40CFR 60-A.9

This rule citation allows the public access to any information submitted to the EPA Administrator (or state contact), in conjunction with a project subject to this section of the regulation.

40CFR 60-WWW.752 (b) (2)

If the non-methane organic carbon emission rate is greater than 50 megagrams/year (55 tons/year), the owner or operator must submit a design plan for a collection and control system.

40CFR 60-WWW.754 (a) (1)

This condition specifies the equations to be used to calculate the non-methane organic carbon emission rate from an MSW landfill.

40CFR 60-WWW.754 (a) (2)

This condition sets forth the requirements for conducting a Tier 1 test of non-methane organic carbon emissions from an MSW landfill. The emission rate is calculated using the default values cited in 40 CFR 60.754(a)(1) and compared to 50 megagrams/year (55 tons/year).

40CFR 60-WWW.754 (a) (3)

This condition sets forth the requirements for conducting a Tier 2 test of NMOC emissions from an MSW landfill.

40CFR 60-WWW.754 (a) (4)

This condition sets forth the requirements for conducting a Tier 3 test for NMOC emissions at an MSW landfill.

40CFR 60-WWW.754 (a) (5)

The owner or operator may use other methods to determine the NMOC concentration or a site-specific methane generation rate constant as an alternative to the methods required in 40 CFR Part 60.754(a)(3) and (a)(4) if the method has been approved by the Administrator

40CFR 60-WWW.757 (b)

This condition requires that a non-methane organic carbon emission report be submitted to the EPA administrator.

40CFR 61-M.154

This condition requires that there be no visible emissions from any active disposal area of the landfill where asbestos containing waste has been placed or that this type of area be covered to prevent disturbance of the asbestos containing waste.

6NYCRR 201-7.2

This requirement is placed on the facility to limit the amount of Non-methane Organic Compound (NMOC) emissions allowed from the facility under the current permit to less than 55 tons per year. Should the facility calculate NMOC emissions in excess of this limit they will then be required to meet all requirements of 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills.

6NYCRR 202-2.3

This rule specifies the information to be included in a required emission statement.



6NYCRR 202-2.4

This regulation specifies that any required emission statement must be submitted to the Department before April 15 each year for emissions of the previous calendar year. The regulation also establishes a set of acceptable emissions estimation methods that may be used including the use of monitoring methods, if accepted by the department, and the transmittal of the emission statement information to the Department. Finally, such information may be designated as confidential, as per department approval, except for the following information: emissions, estimated emissions method, and the Source Classification Code.

6NYCRR 217-3.2

This citation prohibits the idling of motionless diesel powered vehicles for periods longer than 5 minutes. Exceptions to this prohibition are contained in 6 NYCRR 217-3.3.

6NYCRR 217-3.3

This citation details under what circumstances the diesel idling prohibition contained in 6 NYCRR 217-3.3 does not apply.

6NYCRR 225-1.2 (a) (2)

This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8

This regulation requires an owner or operator of a facility which purchases and fires coal and/or oil to submit reports to the commissioner containing fuel analysis data, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1.

6NYCRR 227 .2 (b) (1)

This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6NYCRR 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.

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

Location Facility/EU/EP/Process/ES	Regulation	Short Description
FACILITY	40CFR 60-WWW.752(b)(2)	Standards for air emissions from MSW landfills
Reason: The provisions of 40 CFR 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills, that apply to the design, installation, operation, monitoring, record keeping, reporting and compliance certification of a landfill gas collection and control system do not apply to this facility at this time. Such provisions will apply to this facility when the calculated non-methane organic compound (NMOC) emission rate equals or exceeds 50 megagrams per year. The NMOC emission rate is calculated annually per the requirements of 40 CFR 60.752(b)(1) that are contained as a condition of this permit.		
FACILITY	40CFR 60-WWW.753(a)	Operational standards for collection and control systems



Permit Review Report

Permit ID: 6-2252-00007/00015

Renewal Number: 1

Modification Number: 2 09/04/2008

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.753(b) Op Standards for collection/  
control systems-Pressure

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.753(c) Operational Standards for  
Collection and Control  
Systems

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.753(d) Operational Standards for  
Collection and Control Systems  
- Surface Methane

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.753(e) Operational Standards for  
Collection and Control Systems  
- Collected Gases to Control  
System

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.753(f) Operational Standards for  
Collection and Control Systems  
- Control Systems

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.753(g) Operational Standards for  
Collection and Control Systems  
- Corrective Action

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.754(b) Test Methods and Procedures

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.754(d) Performance Test

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.755(a) Compliance Provisions -  
collection system

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.755(b) Compliance Provisions - wells

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.755(c) Compliance Provisions -  
surface methane

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.755(d) Compliance Provisions -  
instrumentation  
specifications

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.755(e) Compliance Provisions -  
Start-up, shutdown, or  
malfunction

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.756(a) Monitoring of Operations



Permit Review Report

Permit ID: 6-2252-00007/00015

Renewal Number: 1

Modification Number: 2 09/04/2008

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.756(c) Monitoring of Operations - Open flare

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.756(e) Monitoring of Operations - Alternative Parameters

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.756(f) Monitoring of Operations - Surface Methane

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.757(f) Reporting requirements - Annual Reports

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.757(g) Reporting requirements - Collection and control system

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.758(a) Recordkeeping requirements - waste

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.758(b) Recordkeeping requirements - control equipment

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.758(c) Recordkeeping requirements - operating parameters

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.758(d) Recordkeeping requirements - collectors

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.758(e) Recordkeeping requirements - exceedances of operational standards

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.759(a) Specifications for active collection systems

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.759(b) Specifications for active collection systems

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

FACILITY 40CFR 60-WWW.759(c) Specifications for active collection systems

Reason: Same reason as described above for 40 CFR 60-WWW 752(b)(2).

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The



applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

**Compliance Certification**

Summary of monitoring activities at DANC SOLID WASTE MANAGEMENT FACILITY:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	31	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	2-1	work practice involving specific operations
FACILITY	2-2	record keeping/maintenance procedures
4-GENST/-/003/OLYM1	2-4	intermittent emission testing
FACILITY	2-3	monitoring of process or control device parameters as surrogate

**Basis for Monitoring**

- 1) 6 NYCRR Part 225-1.2(a)(2): In order to utilize emergency diesel generators in a coordinated demand reduction program (CDRP) this facility must burn distillate oil with a maximum sulfur content of 1.5% by weight. Facility must obtain certifications of the sulfur content of all distillate oil delivered to the facility.
- 2) 6 NYCRR Part 225-1.8: Facility is required to maintain records of the sulfur content of all distillate oil delivered to the facility.
- 3) 6 NYCRR Part 227.2(b)(1): In order to utilize emergency diesel generators in a coordinated demand reduction program (CDRP) this facility must ensure particulate emissions from the diesel generators are less than 0.1 lb/MMBtu. Facility will test from particulate emissions from the diesel generators when requested by the Department.
- 4) 6 NYCRR Part 227-1.3(a): In order to utilize emergency diesel generators in a coordinated demand reduction program (CDRP) this facility must ensure that visible emissions from the diesel generators do not exceed 20% opacity. Facility is required to take daily visible emissions observations of the diesel generator stacks whenever they are in operation.