NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 9
270 Michigan Avenue, Buffalo, NY 14203-2915
P: (716) 851-7165 | F: (716) 851-7168
www.dec.ny.gov

July 8, 2016

Ms. Jill Banaszak
Technical Manager
CWM Chemical Services, L.L.C.
1550 Balmer Road
PO Box 200
Model City New York 14107

Dear Ms. Banaszak:

NOTICE OF COMPLETE APPLICATION
AIR STATE FACILITY PERMIT MODIFICATION
PROPOSED RMU-2 LANDFILL PROJECT
TOWNS OF PORTER & LEWISTON
NIAGARA COUNTY
DEC NO. 9-2934-00022/00233

The New York State Department of Environmental Conservation (the "Department") has determined the Air State Facility (ASF) permit modification application related to CWM's proposal to construct and operate a new landfill designated as "Residual Management Unit – Two" ("RMU-2") at its Model City facility to be complete.

As a result, the Department has prepared and is providing as enclosures to this letter: a Notice of Complete Application, Draft Modified ASF Permit, Fugitive Dust Control Plan (Attachment L of the draft Part 373 Permit Modification) and Air & Meteorological Monitoring Plan (Attachment N of the draft Part 373 Permit Modification).

Public notice and the opportunity for public comment is required for this application. Please have the Notice published in the Buffalo News, Niagara Gazette and the Lewiston Porter Sentinel once during the week of July 11, 2016 on any day Monday through Saturday.

For the Notice of Complete Application, only that information presented between the horizontal lines should be published. Please request the newspaper publisher to provide you with a Proof of Publication for the Notice. Upon receipt of the Proof of Publication promptly forward it to this office and to James T. McClymonds, Chief Administrative Law Judge, NYSDEC Office of Hearings, 625 Broadway, 1st Floor, Albany, New York 12233-1550. Be advised that Department staff will arrange for publication of the Notice in the Department's Environmental News Bulletin (ENB) on or about the same date as the newspapers' publication.

In order to facilitate public participation, this letter hereby requires CWM to prepare four (4) hard (paper) copies of this letter and its enclosures, and deliver them to the following document repositories on or before July 13, 2016:

- Youngstown Free Library, 240 Lockport Street, Youngstown;
- Ransomville Free Library, 3733 Ransomville Road;
- Porter Town Hall, 3265 Creek Road, Youngstown; and
- Lewiston Public Library, 305 South 8th Street, Lewiston.

Please note that two versions of the Fugitive Dust Control Plan (Attachment L of the draft Part 373 Permit Modification) and the Air & Meteorological Monitoring Plan (Attachment N of the draft Part 373 Permit Modification) are enclosed with this letter. One version of each plan is marked to show the changes that were made to it. The other version of each plan is unmarked. Ensure both versions of each plan are placed in the repositories.

In addition, CWM is required to post ELECTRONIC copies of this letter, its enclosures, and all the correspondence and reports between the Department and CWM related to this application in "PDF" format on its previously established web site.

This notification does not signify approval of your application for permit. Additional information may be requested from you at a future date, if deemed necessary to reach a decision on your application.

If you have any questions please contact me or Mr. Mark Passuite at the above address or phone number.

Sincerely,

David S. Denk
Regional Permit Administrator

Enclosures:

- Notice of Complete Application
- Draft ASF Permit
- Fugitive Dust Control Plan (Attachment L of the draft Part 373 Permit Modification) – 2 Versions
- Air & Meteorological Monitoring Plan (Attachment N of the draft Part 373 Permit Modification) – 2 Versions

THIS IS NOT A PERMIT

New York State Department of Environmental Conservation
Notice of Complete Application

Date: 07/08/2016

Applicant: CWM CHEMICAL SERVICES LLC
1550 BALMER RD
MODEL CITY, NY 14107

Facility: CWM CHEMICAL SERVICES - MODEL CITY SITE
1550 BALMER RD
MODEL CITY, NY 14107

Application ID: 9-2934-00022/00233

Permits(s) Applied for: 1 - Article 19 Air State Facility

Project is located: in PORTER in NIAGARA COUNTY

Project Description:
CWM Chemical Services, L.L.C. ("CWM") proposes a modification to its current Air State Facility permit, No. 9-2934-00022/00233, for the Model City Facility, located at 1550 Balmer Road, in the Towns of Porter and Lewiston, to address air emissions from the construction and operation of a proposed hazardous waste landfill, referred to as the Residual Management Unit - Two (RMU-2).

The Department has prepared a draft permit modification and made a tentative determination to issue a modified Air State Facility permit pursuant to Article 19 of the Environmental Conservation Law and Part 201-5 of Title 6 of the New York Codes Rules and Regulations ("draft ASF Permit Modification"). The Department has determined CWM is not a major source of criteria or hazardous air pollutants, and thus, is not subject to major source Title V air permitting nor the National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations - 40 CFR 63 Subpart DD.

The draft ASF Permit Modification references the operating and monitoring requirements in the draft RMU-2 Hazardous Waste Management Part 373 permit modification ("draft Part 373 Permit Modification") pertaining to certain pollution control requirements for air emission sources associated with hazardous waste management. Modifications are also being proposed to the draft Part 373 Permit Modification for CWM's proposed RMU-2 landfill. Specifically, proposed modifications are being made to the "Fugitive Dust Control Plan" (Attachment L of the draft Part 373 Permit Modification) and the "Air & Meteorological Monitoring Plan" (Attachment N of the draft Part 373 Permit Modification) to impose additional and more stringent requirements with respect to dust control and air monitoring associated with the construction and operation of the proposed RMU-2 landfill. These modified Attachments are intended to replace, in their entirety, the versions of Attachments L & N originally presented in the draft Part 373 Permit Modification for CWM's proposed RMU-2 landfill.

Please note that two versions of the Fugitive Dust Control Plan (Attachment L of the draft Part 373 Permit Modification) and the Air & Meteorological Monitoring Plan (Attachment N of the draft Part 373 Permit Modification) are available for review at the document repositories. One version of each plan is marked to show the changes that were made to it. The other version of each plan is unmarked.

Persons wishing to inspect the subject draft ASF Permit Modification and draft Part 373 Permit Modification files, including the application with all relevant supporting materials, the draft permit, and other materials available to the DEC that are relevant to this permitting decision should contact the DEC representative listed below. The Draft ASF Permit may be viewed and printed from the Department web site at: http://www.dec.ny.gov/dardata/boss/afs/draft_asf.html

Availability of Application Documents:
Filed application documents, and Department draft permits where applicable, are available for inspection during normal business hours at the address of the contact person. To ensure timely service at the time of inspection, it is recommended that an appointment be made with the contact person.

State Environmental Quality Review (SEQR) Determination
A draft environmental impact statement has been prepared on this project and is on file.

SEQR Lead Agency NYS Department of Environmental Conservation

State Historic Preservation Act (SHPA) Determination
The proposed activity is not subject to review in accordance with SHPA. The application type is exempt and/or the project involves the continuation of an existing operational activity.

DEC Commissioner Policy 29, Environmental Justice and Permitting (CP-29)
It has been determined that the proposed action is not subject to CP-29.

Availability For Public Comment
Comments on this project must be submitted in writing to the Contact Person no later than 08/12/2016 or 30 days after the publication date of this notice, whichever is later.

Contact Person
MARK F PASSUITE
NYSDEC
270 Michigan Ave
Buffalo, NY 14203-2915
(716) 851-7165

CC List for Complete Notice

ENB

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-2934-00022/00233
Mod 0 Effective Date: 10/24/2014 Expiration Date: 10/23/2024

Mod 1 Effective Date: Expiration Date:

Permit Issued To:CWM CHEMICAL SERVICES LLC
1550 BALMER RD
MODEL CITY, NY 14107

Contact: Jonathan P Rizzo
CWM Chemical Services LLC
1550 Balmer Rd
Model City, NY 14107
(716) 286-0354

Facility: CWM CHEMICAL SERVICES - MODEL CITY SITE
1550 BALMER RD
MODEL CITY, NY 14107

Contact: MICHAEL F MAHAR
CWM CHEMICAL SERVICES LLC
1550 BALMER ROAD
MODEL CITY, NY 14107
(716) 286-1550

Description:
CWM Facility Description (Ren 0 Mod 1 revision)

(1) CWM Chemical Services, L.L.C., a wholly owned subsidiary of Waste Management of New Jersey, Inc. and indirect, wholly owned subsidiary of Waste Management, Inc. owns and operates the Model City Facility located at 1550 Balmer Road, Model City, New York. The facility is a hazardous waste treatment, storage and disposal, and recovery facility, which accepts hazardous and industrial non-hazardous waste.

(2) This permit action is a modification to the Air State Facility permit to include the construction and operation of proposed Residual Management Unit 2 (RMU-2), a new landfill.

(3) A modified draft Air State Facility permit was supplied to the New York State Facility Siting Board, Administrative Law Judge Daniel P. O'Connell and the petitioners seeking party status via letter dated March 20, 2015. Based on a review of

the post-Issues Conference submissions, staff re-evaluated the RMU-2 application and determined that the emissions inventory, fugitive dust plan and ambient air monitoring plan provided by CWM was deficient and revisions were required to make the application complete. The Department's concerns were identified in a letter to Judge O'Connell, dated December 1, 2015. Staff reviewed CWM's response to this letter and have revised the Air State Facility application and permit as follows:

(a)The permit application information was updated by:
(i) Changing the emission range code for carbon monoxide from A to B.
(ii) Changing the emission range code for sulfur dioxide changed from B to A.
(iii) Adding emission range codes for persistent, bioaccumulative or toxic (PBT) compounds.
(iv) Expiring Emission Unit 1-BOILER, Process HTR, and Emission Sources BLR01, BLR02 and BLR03 because these distillate oil fired boilers were removed from service recently.

(b) The permit was revised by:
(i) Updating the emission summaries and narrative in this facility description.
(ii) Permit conditions for 6NYCRR Part 212 and 40 CFR 63 subpart ZZZZ were revised to clarify recordkeeping and reporting requirements.
(iii) Removing Emission Unit 1-BOILR, Process HTR, and Emission Sources BLR01, BLR02 and BLR03 because the propane fired boilers that replaced the distillate oil fired boilers are exempt from permitting.
(iv) Removing the permit condition for 40 CFR 63 Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources because the distillate oil boilers were removed.

In addition, the fugitive dust control plan and the air and meteorological monitoring plan, that are part of the sitewide Part 373 Hazardous Waste Management permit, have been revised.

(4) In reference to the significant mass emission rates for persistent, bioaccumulative or toxic (PBT) compounds, as listed in Table 1 of 6 NYCRR Part 201-9, the facility exceeds the threshold for three compounds as compared below. Exceedance of the listed threshold only requires the facility to obtain an air state facility permit instead of an air facility registration. The major source threshold is listed in the table for reference and comparison purposes. This facility is not a major source of emissions, so it is not required to have a major source Title V (five) air permit.

PBT Contaminate	Facility Emission Rate (lb/yr)(1)	6NYCRR Part 201-9 Threshold to obtain an Air State Facility Permit (lb/yr)	6NYCRR Part 201-6 Major Source HAP Threshold to obtain an Air Title V Permit(2) (lb/yr)
Pesticides	0.24	0	20,000
PCBs (3)	359.56	0.1	20,000
Polycyclic organic Matter (POM)	48.20	1	20,000

(1) Pounds per year
(2) Major Source total HAP threshold is 50,000 pounds per year
(3) Polychlorinated biphenyl

(5) The change in facility emissions from the proposed RMU-2 Expansion are:

	Criteria Contaminates				Persistent, Bioaccumulative or Toxic (PBT) Compounds				
	VOC(1) (tpy)(6)	HAP(2) (tpy)	PM10(3) (tpy)	PM2.5(4) (tpy)	Benzene (lb/yr)*	Methylene Chloride (lb/yr)*	TCE(5) (lb/yr)*	PCBs (lb/yr)*	POM (lb/yr)*
Existing Facility	3.20	1.33	7.44	5.66	25.3	829.3	138.4	122.4	15.7
Proposed RMU-2	0.52	0.53	8.46	2.69	16.3	78.6	24.0	237.2	32.5
Proposed Total	3.71	1.86	15.90	8.35	41.6	907.9	163.4	259.6	48.2

(1) Volatile organic compound
(2) Hazardous air pollutant
(3) Particulate matter less than 10 microns
(4) Particulate matter less than 2.5 microns
(5) Trichloroethylene
(6) Tons per year
* identifies the PBT pollutants added to this table compared to the 3/20/15 draft of this proposed permit
Emissions of PBT's that increased less than 5 pound per year are not included in this table.

(6) The facility is subject to specific air emission standards as specified in the facility's sitewide Part 373 Hazardous Waste Management Permit. The regulations include Part 373-2.28 Air Emission Standards for Equipment Leaks, and Part 373-2.29 Air Emission Standards for Tanks, Surface Impoundments, and Containers. For this reason, the Air State Facility permit does not duplicate air emission control requirements that are required under that permit.

(7) Based on air emission estimates, the Department has determined CWM Chemical Services, Inc. is not a major source of criteria or hazardous air pollutants, and thus, is not subject to major source Title V (five) air permitting nor the National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations - 40 CFR 63 Subpart DD. This application estimates that the total HAP emissions are 1.86 tons per year (tpy), well below the major source total HAP criteria of 25 tpy, and below the major source individual HAP criteria of 10 tpy.

(8) The Air State Facility permit references certain air monitoring protocols that are part of the sitewide Part 373 Hazardous Waste Management permit identified as follows:
(a) Fugitive Dust Control Plan;
(b) Air & Meteorological Monitoring Plan;
(c) Stabilization Operations and Maintenance Manual;
(d) Compliance Program for Air Emission Standards for Equipment Leaks;
(e) Aqueous Wastewater Treatment System Operations and Maintenance Manual; and
(f) Compliance Program Air Emission Standards for Tanks, Surface Impoundments and Containers.

(9) The facility has one existing emergency engine, a Cummins Diesel Fire-Water Pump (rated at 187 bhp) that is subject to 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The requirements include:
(a) Change oil and filter every 500 hours of operation or annually, whichever comes first;
(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and
(d) Installation of a non-resettable hour meter.

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

Permit Administrator: DAVID S DENK
DIVISION OF ENVIRONMENTAL PERMITS
270 MICHIGAN AVE
BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ___ / ___ / _____

Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

PAGE LOCATION OF CONDITIONS

PAGE

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

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

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

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

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

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 1-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:
The permittee must submit a renewal application at least 180 days before expiration of permits for both Title V and State Facility Permits.

Item 1-1.3:
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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

Item 4.1:
The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:
Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2915
(716) 851-7165

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:CWM CHEMICAL SERVICES LLC
1550 BALMER RD
MODEL CITY, NY 14107

Facility: CWM CHEMICAL SERVICES - MODEL CITY SITE
1550 BALMER RD
MODEL CITY, NY 14107

Authorized Activity By Standard Industrial Classification Code:
4953 - REFUSE SYSTEMS

Permit Effective Date: Permit Expiration Date:

PAGE LOCATION OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

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

Item A: **Sealing - 6 NYCRR 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

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

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

Item C: **Maintenance of Equipment - 6 NYCRR 200.7**

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

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or

modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

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

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

Item E: **Recycling and Salvage - 6 NYCRR 201-1.7**

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

Item F: **Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8**
No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: **Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)**
The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: **Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)**
The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution

control requirements, regulations, or law.

Item I: **Required Emission Tests - 6 NYCRR 202-1.1**

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

Item J: **Open Fires Prohibitions - 6 NYCRR 215.2**
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: **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 L: **Federally Enforceable Requirements - 40 CFR 70.6 (b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1-1: **Non Applicable requirements**
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-6.4 (g)

Item 1-1.1:
This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

Condition 1-2: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63, Subpart DD

Item 1-2.1:
The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 1-2.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Based on air emission estimates from this application to modify the permit, the Department has determined CWM Chemical Services, Inc. is not a major source of hazardous air pollutants (HAP) and, therefore, is not subject to the National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations - 40 CFR 63 Subpart DD. If operations change significantly from the assumptions made to estimate emissions, CWM may be required to determine applicability to subpart DD at that time and submit the supporting information.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2: Compliance Demonstration
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63, Subpart DD

Expired by Mod 1

Item 2.1:
The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 2.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

CWM Chemical Services, Inc. submitted a letter dated March 6, 2000 to the USEPA Air Compliance Branch Region 2, stating it is not a major source of hazardous air pollutants and, thus, is not subject to the National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations - 40 CFR 63 Subpart DD. However, the March 6, 2000 letter was not an official request for an applicability determination. As such, no later than December 31, 2014, CWM must submit an applicability determination request to the USEPA to obtain an official determination regarding the applicability status of this facility to 40 CFR 63 Subpart DD.

Monitoring Frequency: SINGLE OCCURRENCE
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Condition 3: **Compliance Demonstration**
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:

Replaced by Condition(s) 1-3

Item 3.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-AQWTP

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 3.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMISSION UNIT 1-AQWTP
OPERATION AND MONITORING REQUIREMENTS

(1) Tanks containing hazardous waste with >500 ppm VOCs, as listed in the facility's RCRA permit, are subject to 6NYCRR 373-2.29 AIR EMISSION STANDARDS for Tanks, Containers and Surface Impoundments. As required by this regulation, tanks determined to be Level 1 are either closed with no cracks, gaps or openings or if they are vented, a control device such as a carbon canister is employed. The facility must perform tank inspections and corrective action as specified in this regulation. As a best management practice, the carbon canisters

are monitored routinely for breakthrough and replaced in accordance with the facility's 6NYCRR 373-2.29 Compliance Plan. The monitoring and carbon canister replacement for the Level 2 tanks are also completed in accordance with the Compliance Plan.

(2) When strong acid wastes are being processed, the tanks in use are vented to the caustic scrubber to neutralize the acid vapor. The caustic scrubber is operated, monitored and maintained in accordance with the facility's Aqueous Waste Treatment Operations & Maintenance Manual.

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

Condition 1-3: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Part 212

Replaces Condition(s) 3

Item 1-3.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-AQWTP

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 1-3.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMISSION UNIT 1-AQWTP
OPERATION AND MONITORING REQUIREMENTS

(1) Tanks containing hazardous waste with >500 ppm VOCs, as listed in the facility's RCRA permit, are subject to 6NYCRR 373-2.29 AIR EMISSION STANDARDS for Tanks, Containers and Surface Impoundments. As required by this regulation, tanks determined to be Level 1 are either closed with no cracks, gaps or openings or if they are vented, a control device such as a carbon canister is employed. The facility must perform tank inspections and corrective action as specified in this regulation. As a best management practice, the carbon canisters are monitored routinely for breakthrough and replaced in accordance with the facility's 6NYCRR 373-2.29 Compliance Plan. The monitoring and carbon canister replacement for the Level 2 tanks are also completed in accordance with the Compliance Plan.

(2) When strong acid wastes are being processed, the tanks in use are vented to the caustic scrubber to neutralize the acid vapor. The

caustic scrubber is operated, monitored and maintained in accordance with the facility's Aqueous Waste Treatment Operations & Maintenance Manual.

(3) Recordkeeping requirements are in 6NYCRR 373-2.29(j) and reporting requirements are in 6NYCRR 373-2.29(k).

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

Condition 4: Compliance Demonstration
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63, Subpart JJJJJJ

Expired by Mod 1

Item 4.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BOILR

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE
CAS No: 0NY100-00-0 TOTAL HAP

Item 4.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

OIL-FIRED BOILER REQUIREMENTS

The three oil-fired boilers (BLR01, BLR02, BLR03) are subject to the work practice standards of 40 CFR 63 Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources as follows:

(1) As per §63.11225(a), submit an Initial Notification of Applicability by January 20, 2014.

(2) As per §63.11214, complete an Initial Compliance Tune-up on Boilers BLR01, BLR02, and BLR03 by March 21, 2014. In addition, complete a one-time energy assessment on Boiler BLR01 by March 21, 2014. CWM completed the initial tune-ups on the boilers in November, 2013 and submitted a Notification of Compliance status on December 18, 2013.

(3) As per §63.11214, submit a Notification of Compliance Status for the energy assessment for BLR01 by July 19, 2014.

(4) As per §63.11223, demonstrate continuous compliance with the work

practice and management practice standards for boilers BLR01 and BLR02 by conducting a tune-up of the boilers every two (2) years. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

(5) As per §63.11223, demonstrate continuous compliance with the work practice and management practice standards for boiler BLR03 by conducting a tune-up of the boiler every five (5) years. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up.

(6) As per §63.11223, the tune-ups shall be completed as follows:
(a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.
(b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
(c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.
(d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
(e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
(f) Maintain on-site and submit, if requested by the Administrator, a report containing the following information.
(i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
(ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
(iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
(g) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of

startup.

(7) As per §63.11225, prepare by March 1, a biennial or 5-year compliance report as specified below.
(a) Company name and address.
(b) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
(i) "This facility complies with the requirements in § 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."
(ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
(iii) "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

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

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

Applicable Federal Requirement:40CFR 63.6603(a), Subpart ZZZZ

Replaces Condition(s) 5

Item 1-4.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FRPMP

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 1-4.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMERGENCY ENGINE
EMISSION RELATED OPERATING LIMITATIONS

Operate the existing emergency engine, Cummins Diesel Fire-Water Pump

(rated at 187 bhp) with the following maintenance procedures from table 2d item 4:
(1) Change oil and filter every 500 hours of operation or annually, whichever comes first;
(2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
(3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Keep records of the maintenance conducted on the emergency engine in order to demonstrate that you operated and maintained the engine according to manufacturer's instructions or your own maintenance plan [63.6655(e)];

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63.6603(a), Subpart ZZZZ

Replaced by Condition(s) 1-4

Item 5.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FRPMP

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 5.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMERGENCY ENGINE
EMISSION RELATED OPERATING LIMITATIONS

Operate the existing emergency engine, Cummins Diesel Fire-Water Pump (rated at 187 bhp) with the following maintenance procedures:

(1) Change oil and filter every 500 hours of operation or annually, whichever comes first;
(2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
(3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

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

Condition 1-5: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.6625, Subpart ZZZZ

Replaces Condition(s) 6

Item 1-5.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FRPMP

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 1-5.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMERGENCY ENGINE
OPERATION AND MAINTENANCE REQUIREMENTS

(1) Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(2) Install a non-resettable hour meter if one is not already installed.

(3) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards apply at all times.

(4) Utilize an oil analysis program in order to extend the specified oil change requirement, if desired. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must, at a minimum, analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows:

(a) Total Base Number is less than 30 percent of the total base Number of the oil when new;
(b) Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or
(c) Percent water content (by volume) is greater than 0.5.

(5) If all of the condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

(6) Records of all maintenance shall be kept on site [63.6655(e)]

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Compliance Demonstration
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63.6625, Subpart ZZZZ

Replaced by Condition(s) 1-5

Item 6.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FRPMP

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 6.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMERGENCY ENGINE
OPERATION AND MAINTENANCE REQUIREMENTS

(1) Operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(2) Install a non-resettable hour meter if one is not already installed.

(3) Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate

and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards apply at all times.

(4) Utilize an oil analysis program in order to extend the specified oil change requirement, if desired. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must, at a minimum, analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows:

(a) Total Base Number is less than 30 percent of the total base Number of the oil when new;
(b) Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or
(c) Percent water content (by volume) is greater than 0.5.

(5) If all of the condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis. If the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

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

Condition 1-6: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.6640, Subpart ZZZZ

Replaces Condition(s) 7

Item 1-6.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FRPMP

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 1-6.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMERGENCY ENGINE

OPERATIONAL REQUIREMENTS

(1) Unlimited use for emergencies (e.g., power outage, fire, flood).

(2) May operate for 100 hr/yr for any combination of the following:
(a) maintenance/testing;
(b) 50 hr/yr of the 100 hr/yr allocation can be used for non-emergency situations if there is no financial arrangement.

(3) Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation [63.6655(f)].

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 7: Compliance Demonstration
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63.6640, Subpart ZZZZ

Replaced by Condition(s) 1-6

Item 7.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FRPMP

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 7.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMERGENCY ENGINE
OPERATIONAL REQUIREMENTS

(1) Unlimited use for emergencies (e.g., power outage, fire, flood).

(2) May operate for 100 hr/yr for any combination of the following:

(a)maintenance/testing;

(b)50 hr/yr of the 100 hr/yr allocation can be used for non-emergency situations if no financial arrangement.

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

Condition 8: Compliance Demonstration
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63.6655, Subpart ZZZZ

Expired by Mod 1

Item 8.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FRPMP

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP

Item 8.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMERGENCY ENGINE
RECORDKEEPING KEEPING AND REPORTING

(1) Keep records of the maintenance conducted on the emergency engine in order to demonstrate that you operated and maintained the engine according to manufacturer's instructions or your own maintenance plan;

(2) Keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. Document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

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

Condition 1-7: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Part 212

Replaces Condition(s) 9

Item 1-7.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-LANDF

Regulated Contaminant(s):
CAS No: 0NY075-00-5 PM-10

Item 1-7.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

GENERAL FUGITIVE DUST OPERATIONAL REQUIREMENTS

(1) The facility must employ the best management practices specified in the facility's FUGITIVE DUST CONTROL PLAN to control dust during landfill operations and on the facility roadways. This plan is an attachment to the facility's Site-wide RCRA Operating Permit. In addition, the Part 373 Permit contains a requirement for the application of Daily Cover on bulk waste placed in the active landfill.

(2) Records of monitoring fugitive dust control will be kept on site and made available upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 9: Compliance Demonstration
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:

Replaced by Condition(s) 1-7

Item 9.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-LANDF

Regulated Contaminant(s):
CAS No: 0NY075-00-5 PM-10

Item 9.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

GENERAL FUGITIVE DUST OPERATIONAL REQUIREMENTS

(1) The facility must employ the best management practices specified in the facility's FUGITIVE DUST CONTROL PLAN to control dust during landfill operations and on the facility roadways. This plan is an attachment to the facility's Site-wide RCRA Operating Permit. In addition, the Part 373 Permit contains a requirement for the

application of Daily Cover on bulk waste placed in the active landfill.

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

Condition 1-8: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Part 212

Replaces Condition(s) 10

Item 1-8.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-LEACH

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 1-8.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMISSION UNIT 1-LEACH
OPERATION AND MONITORING REQUIREMENTS

(1) Tanks containing hazardous waste with >500 ppm VOCs, as listed in the facility's RCRA permit, are subject to 6NYCRR 373-2.29 AIR EMISSION STANDARDS for Tanks, Containers and Surface Impoundments. As required by this regulation, tanks determined to be Level 1 are either closed with no cracks, gaps or openings or if they are vented, a control device such as a carbon canister is employed. The facility must perform tank inspections and corrective action as specified in this regulation. As a best management practice, the carbon canisters are monitored routinely for breakthrough and replaced in accordance with the facility's 6NYCRR 373-2.29 Compliance Plan.

(2) All landfill standpipes must be covered at all times, except when being attended. As required by the facility's Site-wide RCRA Operating Permit, covers shall be inspected on a routine basis.

(3) Recordkeeping requirements are in 6NYCRR 373-2.29(j) and reporting requirements are in 6NYCRR 373-2.29(k).

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

Condition 1-9: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Part 212

Replaces Condition(s) 11

Item 1-9.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-LEACH

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 1-9.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMISSION UNIT 1-LEACH
EQUIPMENT LEAK REQUIREMENTS

(1) Equipment including pumps, valves, and flanges in contact with hazardous waste containing more than 10 percent organics is subject to 6NYCRR 373-2.28 AIR EMISSION STANDARDS for Equipment Leaks. The facility must perform monitoring and corrective actions as specified in the regulation and referenced in the facility's RCRA permit.

(2) Specified valves and flanges in the landfill standpipes shall be inspected and monitored in accordance with the requirements in the facility's 6 NYCRR 373-2.28 Compliance Plan.

(3) Recordkeeping requirements are in 6NYCRR 373-2.28(o) and reporting requirements are in 6NYCRR 373-2.28(p).

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

Condition 10: Compliance Demonstration
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:

Replaced by Condition(s) 1-8

Item 10.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-LEACH

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMISSION UNIT 1-LEACH
OPERATION AND MONITORING REQUIREMENTS

(1) Tanks containing hazardous waste with >500 ppm VOCs, as listed in the facility's RCRA permit, are subject to 6NYCRR 373-2.29 AIR EMISSION STANDARDS for Tanks, Containers and Surface Impoundments. As required by this regulation, tanks determined to be Level 1 are either closed with no cracks, gaps or openings or if they are vented, a control device such as a carbon canister is employed. The facility must perform tank inspections and corrective action as specified in this regulation. As a best management practice, the carbon canisters are monitored routinely for breakthrough and replaced in accordance with the facility's 6NYCRR 373-2.29 Compliance Plan.

(2) All landfill standpipes must be covered at all times, except when being attended. As required by the facility's Site-wide RCRA Operating Permit, covers shall be inspected on a routine basis.

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

Condition 11: Compliance Demonstration
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:

Replaced by Condition(s) 1-9

Item 11.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-LEACH

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 11.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMISSION UNIT 1-LEACH
EQUIPMENT LEAK REQUIREMENTS

(1) Equipment including pumps, valves, and flanges in contact with hazardous waste containing more than 10 percent organics is subject to 6NYCRR 373-2.28 AIR EMISSION STANDARDS for Equipment Leaks. The

facility must perform monitoring and corrective actions as specified in the regulation and referenced in the facility's RCRA permit.

(2) Specified valves and flanges in the landfill standpipes shall be inspected and monitored in accordance with the requirements in the facility's 6 NYCRR 373-2.28 Compliance Plan.

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

Condition 1-10: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Part 212

Replaces Condition(s) 12

Item 1-10.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-STABL

Regulated Contaminant(s):
CAS No: 0NY075-00-5 PM-10

Item 1-10.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMISSION UNIT 1-STABL
OPERATION AND MONITORING REQUIREMENTS

(1)The facility shall perform a monthly visual inspection of the bags located within the stabilization facility baghouses in accordance with the facility's STABILIZATION Operation & Maintenance Manual. Upon inspection, any damaged or defective bags shall be replaced. If the bags are caked with dust, a change out shall be performed. A record of the inspection and any necessary corrective action is placed in the Operating Record.

(2)The facility shall complete a daily visual inspection of the stabilization facility baghouses on operating days to verify no visible releases of particulates to the air. The inspection shall be completed in accordance with the Inspection Plan as specified in the facility's RCRA Permit. A completed inspection form is placed in the Daily Operating Record.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Compliance Demonstration

Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:

Replaced by Condition(s) 1-10

Item 12.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-STABL

Regulated Contaminant(s):
CAS No: 0NY075-00-5 PM-10

Item 12.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

EMISSION UNIT 1-STABL
OPERATION AND MONITORING REQUIREMENTS

(1)The facility shall perform a monthly visual inspection of the bags located within the stabilization facility baghouses in accordance with the facility's STABILIZATION Operation & Maintenance Manual. Upon inspection, any damaged or defective bags shall be replaced. If the bags are caked with dust, a change out shall be performed. A record of the inspection and any necessary corrective action is placed in the Operating Record.

(2)The facility shall complete a daily visual inspection of the stabilization facility baghouses on operating days to verify no visible releases of particulates to the air. The inspection shall be completed in accordance with the Inspection Plan as specified in the facility's RCRA Permit. A completed inspection form is placed in the Daily Operating Record.

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

STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

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

Item A: 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 applicable requirement.

Item B: **Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**
Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: **General Provisions for State Enforceable Permit Terms and Condition -**

6 NYCRR Part 201-5
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.

Condition 13: Contaminant List
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 13.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY075-00-5
Name: PM-10

CAS No: 0NY100-00-0
Name: TOTAL HAP

CAS No: 0NY998-00-0
Name: VOC

Condition 15: Emission Unit Definition
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 15.1(From Mod 1):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-AQWTP
Emission Unit Description:
Emission Unit 1-AQWTP includes the Aqueous Waste Treatment Plant.

Item 15.2(From Mod 1):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-FRPMP
Emission Unit Description:
Emission Unit 1-FRPMP includes the fire pump for supplying water from the water storage tank to the sprinkler system in the drum warehouse.

Item 15.3(From Mod 1):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-LANDF
Emission Unit Description:
Emission Unit 1-LANDF consists of landfill operations including paved/unpaved road dust emissions, waste unloading and compacting, and landfill capping.

Item 15.4(From Mod 1):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-LEACH
Emission Unit Description:
Emission Unit 1-LEACH consists of leachate collection, handling and storage for landfill areas SLF1-6, SLF-7, SLF-10 and SLF-11.

Item 15.5(From Mod 1):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-STABL
Emission Unit Description:
Emission Unit 1-STABL consists of the Stabilization Facility including two baghouses for control of particulates.

Item 15.6(From Mod 1):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 2-LEACH
Emission Unit Description:
Emission Unit 2-LEACH consists of leachate collection, handling and storage for landfill areas SLF-12, RMU-1 and RMU-2.

Item 15.7(From Mod 0):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: 1-BOILR End Date: 11/24/2015
Emission Unit Description:
Emission Unit 1-BOILR includes the operation of three distillate fuel oil boilers.

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

Condition 20: Process Definition By Emission Unit
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 20.1(From Mod 1):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-AQWTP
Process: TRE Source Classification Code: 5-03-008-99
Process Description:
Process TRE includes emissions from sources located within the Aqueous Waste Treatment Plant. Full treatment train includes neutralization/metals precipitation, filtration to remove solids (FLTPR), biological treatment to reduce organics, and treatment by granular activated carbon (GAC). When old landfill leachate is processed, storage and treatment tanks (AQTNK) and the biotowers (BIOTW) are vented to carbon canisters (CARB2). When waste acids are neutralized, the tanks may be vented to the caustic scrubber (SCRUB). No carbon canisters are present on the GAC or treated effluent tanks or the facultative ponds (PONDS).

Emission Source/Control: CARB2 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: SCRUB - Control
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: AQTNK - Process

Emission Source/Control: BIOTW - Process

Emission Source/Control: FLTPR - Process

Emission Source/Control: PONDS - Process

Item 20.2(From Mod 1):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-FRPMP
Process: PMP Source Classification Code: 2-02-001-07
Process Description:
Process PMP includes the fire pump for supplying water from the water storage tank to the sprinkler system in the drum warehouse. The fire pump is applicable to 40CFR63 Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Emission Source/Control: FRPMP - Combustion
Design Capacity: 187 brake horsepower

Item 20.3(From Mod 1):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-LANDF

Process: FUG Source Classification Code: 5-03-008-99
Process Description:
Process FUG includes operation of the RMU-1 Landfill. Emissions occur from paved/unpaved roads, waste unloading and compacting, and landfill capping.

Emission Source/Control: RMU01 - Process
Design Capacity: 117,359 square meters

Emission Source/Control: RMU02 - Process
Design Capacity: 4,030,700 cubic yards

Item 20.4(From Mod 1):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-LEACH
Process: LE1 Source Classification Code: 5-03-008-99
Process Description:
Process LE1 includes emissions from the collection, handling and storage of leachate from older landfills, SLF 1-6, SLF-7, SLF-10, and SLF-11. The storage tanks (LTNK1) for these units utilize carbon canisters (CARB1) for controlling air emissions due to the higher level of organics in the leachate. Also, included in this process are the emissions from the landfill standpipes (SPIP1). The standpipes (SPIP1) do not use carbon canisters.

Emission Source/Control: CARB1 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: LTNK1 - Process

Emission Source/Control: SPIP1 - Process

Item 20.5(From Mod 1):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-STABL
Process: STB Source Classification Code: 5-03-008-99
Process Description:
Process STB includes emissions from the stabilization facility. Stabilization includes the treatment of metals with cement kiln dust (CKD) or other similar material to change the metals into a less soluble, less toxic form prior to landfill disposal. Emission sources include the stabilization tanks (STBTK) and two (2) baghouses (BGH01 & BGH02) used to control CKD and waste dust emissions during transfer and mixing.

Emission Source/Control: BGH01 - Control
Control Type: FABRIC FILTER

Emission Source/Control: BGH02 - Control
Control Type: FABRIC FILTER

Emission Source/Control: STBTK - Process

Item 20.6(From Mod 1):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 2-LEACH
Process: LE2 Source Classification Code: 5-03-008-99
Process Description:
Process LE2 includes emissions from the collection, handling and storage of leachate from the newer landfills, SLF-12 and RMU-1. These units have lower levels of organic emissions than process LE1. As such, there are no carbon canisters used on these storage tanks (LTNK2). The landfill standpipes are identified as SPIP2.

Emission Source/Control: LTNK2 - Process
Design Capacity: 11,000 gallons

Emission Source/Control: SPIP2 - Process

Item 20.7(From Mod 0):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 1-BOILR
Process: HTR Source Classification Code: 1-03-010-02
Process End Date: 11/24/2015
Process Description:
Process HTR includes three (3) distillate oil fired boilers subject to 40CFR63 Subpart JJJJJJ-National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. The three existing boilers include:

5.23 MMBtu/hr Cleaver Brooks Model CB-101-125 (BLR02)
14.7 MMBtu/hr North American Model 7410 (BLR01)
0.101 MMBtu/hr Fulton Model CB-030 (BLR03)

Emission Source/Control: BLR01 - Combustion Removal Date: 11/24/2015
Design Capacity: 14.7 million Btu per hour

Emission Source/Control: BLR02 - Combustion Removal Date: 11/24/2015
Design Capacity: 5.23 million Btu per hour

Emission Source/Control: BLR03 - Combustion Removal Date: 11/24/2015
Design Capacity: 1 million Btu per hour

ATTACHMENT L

Section D-10
Fugitive Dust Control Plan

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FUGITIVE DUST CONTROL PLAN

FUGITIVE DUST CONTROL PLAN

As a hazardous waste management facility, the possibility exists that potentially contaminated dust could be released to the atmosphere. 6 NYCRR 373-2.14(c)(9) specifies that if a landfill contains any particulate matter which may be subject to wind dispersal, the owner or operator must cover or otherwise manage the landfill to control wind dispersal. Controls, such as wetting, must be applied to dusty waste streams when they are disposed of in the landfill to prevent particulate emissions. Vehicles exiting the landfill are cleaned of any gross contamination at the exit of the landfill. In order to control any potentially contaminated dust that may accumulate on the roads outside the landfill which are used by waste hauling vehicles, road maintenance is performed.

In addition to the control of potentially contaminated dust from waste management activities, CWM employs best management practices to reduce the amount of soil-type particulate dust. The practices are employed during construction, site and stockpile maintenance and the maintenance of roadways which are used by non-waste hauling vehicles.

I. Control of Potentially Contaminated Dust

A. Landfill Operations

1. Waste stream evaluation.

a) Waste streams are evaluated for dusting potential during the approval process. Recommendations for dust control, including wetting, containerization, stabilization treatment, etc. will be included on the disposal decision for any wastes identified with dusting potential.

b) Recommendations for dust control will be considered by the On-Site DEC Monitors during their review and approval of the landfill waste stream. DEC comments will be incorporated into the management approach as appropriate.

c) Upon receipt of the first shipment of any new waste, the sampler will inspect the load and consider its potential for dusting. The disposal decision may be updated if necessary.

d) A dusty load for direct landfill disposal will be flagged for special handling by the landfill personnel and the control method prescribed on the Waste Tracking Form.

2. Waste Disposal

a) If the prescribed method for dust control is wetting, an operator with a water canon may wet the load in the container in the landfill. If required, an operator may use a backhoe to mix the water and the material in the container prior to dumping to

ensure proper wetting of the waste. Additional water may be sprayed during the unloading or after waste placement.

b) Any excess or free liquid resulting from the operations contemplated by the activity above shall be treated as liquid from a precipitation event and shall not be deemed to constitute the disposal of free liquids or bulk waste containing free liquids. This interpretation is in keeping with USEPA policy contained in a statutory interpretative guidance document issued in April, 1986.

c) If a dusty waste load not previous identified as having a dusting potential is noted by the landfill personnel, the lab will be notified and the disposal decision amended as needed to specify controls.

d) If the specified dust controls are unsuccessful during a trial load, CWM shall cease disposal of additional loads and revise the dust control procedure.

e) In addition, a trash fence is employed to prevent wind blown debris from escaping the landfill. On a routine basis, all plastic and paper debris escaping the boundaries of the waste management area will be collected.

f) Additional water may be applied to the landfill operating area to control dust. DEC approved cover material such as ConCover may be used to provide dust control of the waste placed in the landfill.

g) All exposed waste is covered at the end of each day of operation using a DEC approved cover material.

NOTE: The procedures specified above in sections 1. a)-c) and 2. c)-d) must be included in this and any future versions of CWM's Fugitive Dust Control Plan according to a Memorandum of Understanding (89-151) between CWM and NYSDEC.

B. Roadways Used By Waste Hauling Vehicles

1. Potential Contamination Control

a) Vehicles or any other equipment which have entered the landfill facility where it has come into direct contact with waste, shall be inspected for gross contamination prior to leaving the landfill area.

b) Any gross contamination identified on the wheels or equipment will be physically removed before leaving the area to prevent contamination of on-site roads.

c) Despite the efforts described above, the potential exists that contaminated dust may be present on the roadways outside the landfill. These roadways will be cleaned and maintained. A sweeper or other road cleaning equipment may be employed to minimize dust accumulation on these roads. Water trucks may also be employed to

wet the road surfaces and to minimize air borne dust. Note: If truck washing is performed at the landfill exit, the potential for contaminated dust on the roadway will be eliminated.

d) In addition, the site traffic control plan has generally limited these roadways to waste hauling vehicles. A low speed limit has been posted and speed bumps are employed to minimize dust generation.

II. Control of General Particulate Dust

A. Construction Projects

Dust management procedures for new site and landfill construction projects are addressed in the related permit applications where appropriate. A Stormwater Pollution Prevention Plan has been developed for construction projects affecting areas of at least one acre to control soil erosion and contain sediments.

B. Erosion

Vegetative cover is maintained using on-site and contracted services. This includes the application of clay, top soil, fertilizer, hydroseeding and hand seeding. Some berm areas may also be covered with stone or gravel. The use of gabion mats and especially Miramet geotextile fabric has reduced erosion and enhanced vegetative growth.

C. Other Site Roads

Roadways other than those used by waste hauling vehicles will be cleaned and maintained as good housekeeping dictates. In general, the paved roads will be swept as needed, weather permitting. These roads may be wetted down as needed to provide general dust management, adequate visibility and nuisance control.

III. Air Monitoring - Fugitive Dust Emissions

CWM has an Ambient Air Monitoring Program. This program determines the impact, if any, of the hazardous waste activities and other site activities on the surrounding air quality at the Model City facility. This Ambient Air Monitoring Program has been approved by NYSDEC.

A. During RMU-2 Landfill Operations

PM-10 Monitoring

A detailed discussion of the PM-10 monitoring network relative to dust emissions is presented in the PM-10 Air Monitoring Program QA/QC Manual, initially approved by NYSDEC (H. Sandonato to J. Pizzuto, 9/26/90), with subsequent revisions. This monitoring program demonstrates CWM's compliance with the national primary and secondary 24 hour ambient air quality standard for particulate matter (PM-10) of 150 micrograms/cubic meter, 24 hour average concentration.

The results of the PM-10 monitoring shall be treated as PM-2.5 and compared to the national primary and secondary 24 hour ambient air quality standard for particulate matter (PM-2.5) of 35 micrograms/cubic meter, 24 hour average concentration. Alternatively, the Permittee may perform a short-term monitoring program using temporary PM-2.5 units co-located at PM-10 monitoring network locations to establish the fraction of the PM-10 results that are PM-2.5.

The fugitive dust control measures discussed in this plan have consistently resulted in particulate matter levels below the ambient air quality standards. If this monitoring network begins to show levels above the standards, CWM will investigate the cause and revise the Fugitive Dust Control Plan, if necessary.

B. Monitoring During Construction

PM-10 Monitoring

In addition to the perimeter network monitoring, the Permittee shall perform continuous real-time PM-10 monitoring proximate to the landfill construction in accordance with the Residuals Management Unit No. 2 (RMU-2) Air Monitoring Plan (RAMP) for Landfill Constriction as required by Attachment N of this Permit. Response Levels and Response Actions shall be as specified in the RAMP.

ATTACHMENT L

Section D-10
Fugitive Dust Control Plan

[*NOTE: Portions of Attachment L are being modified. Text proposed for addition is indicated in RED, and text proposed for deletion is indicated in ~~STRIKEOUT~~.*]

Date: April 2001 (Revised March 2016)

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FUGITIVE DUST CONTROL PLAN

Date: April 2001 (Revised March 2016)

FUGITIVE DUST CONTROL PLAN

As a hazardous waste management facility, the possibility exists that potentially contaminated dust could be released to the atmosphere. 6 NYCRR 373-2.14(c)(9) specifies that if a landfill contains any particulate matter which may be subject to wind dispersal, the owner or operator must cover or otherwise manage the landfill to control wind dispersal. Controls, such as wetting, must be applied to dusty waste streams when they are disposed of in the landfill to prevent particulate emissions. Vehicles exiting the landfill are cleaned of any gross contamination at the exit of the landfill. In order to control any potentially contaminated dust that may accumulate on the roads outside the landfill which are used by waste hauling vehicles, road maintenance is performed.

In addition to the control of potentially contaminated dust from waste management activities, CWM employs best management practices to reduce the amount of soil-type particulate dust. The practices are employed during construction, site and stockpile maintenance and the maintenance of roadways which are used by non-waste hauling vehicles.

I. Control of Potentially Contaminated Dust

A. Landfill Operations

1. Waste stream evaluation.

    a) Waste streams are evaluated for dusting potential during the approval process. Recommendations for dust control, including wetting, containerization, stabilization treatment, etc. will be included on the disposal decision for any wastes identified with dusting potential.

    b) Recommendations for dust control will be considered by the On-Site DEC Monitors during their review and approval of the landfill waste stream. DEC comments will be incorporated into the management approach as appropriate.

    c) Upon receipt of the first shipment of any new waste, the sampler will inspect the load and consider its potential for dusting. The disposal decision may be updated if necessary.

    d) A dusty load for direct landfill disposal will be flagged for special handling by the landfill personnel and the control method prescribed on the Waste Tracking Form.

2. Waste Disposal

    a) If the prescribed method for dust control is wetting, an operator with a water canon may wet the load in the container in the landfill. If required, an operator may use a backhoe to mix the water and the material in the container prior to dumping to ensure proper wetting of the waste. Additional water may be sprayed during the unloading or after waste placement.

b) Any excess or free liquid resulting from the operations contemplated by the activity above shall be treated as liquid from a precipitation event and shall not be deemed to constitute the disposal of free liquids or bulk waste containing free liquids. This interpretation is in keeping with USEPA policy contained in a statutory interpretative guidance document issued in April, 1986.

c) If a dusty waste load not previous identified as having a dusting potential is noted by the landfill personnel, the lab will be notified and the disposal decision amended as needed to specify controls.

d) If the specified dust controls are unsuccessful during a trial load, CWM shall cease disposal of additional loads and revise the dust control procedure.

e) In addition, a trash fence is employed to prevent wind blown debris from escaping the landfill. On a routine basis, all plastic and paper debris escaping the boundaries of the waste management area will be collected.

f) Additional water may be applied to the landfill operating area to control dust. DEC approved cover material such as ConCover may be used to provide dust control of the waste placed in the landfill.

g) All exposed waste is covered at the end of each day of operation using a DEC approved cover material.

NOTE: The procedures specified above in sections 1. a)-c) and 2. c)-d) must be included in this and any future versions of CWM's Fugitive Dust Control Plan according to a Memorandum of Understanding (89-151) between CWM and NYSDEC.

B. Roadways Used By Waste Hauling Vehicles

1. Potential Contamination Control

a) Vehicles or any other equipment which have entered the landfill facility where it has come into direct contact with waste, shall be inspected for gross contamination prior to leaving the landfill area.

b) Any gross contamination identified on the wheels or equipment will be physically removed before leaving the area to prevent contamination of on-site roads.

c) Despite the efforts described above, the potential exists that contaminated dust may be present on the roadways outside the landfill. These roadways will be cleaned and maintained. A sweeper or other road cleaning equipment may be employed to minimize dust accumulation on these roads. Water trucks may also be employed to wet the road surfaces and to minimize air borne dust. Note: If truck washing is

performed at the landfill exit, the potential for contaminated dust on the roadway will be eliminated.

d) In addition, the site traffic control plan has generally limited these roadways to waste hauling vehicles. A low speed limit has been posted and speed bumps are employed to minimize dust generation.

II. Control of General Particulate Dust

A. Construction Projects

Dust management procedures for new site and landfill construction projects are addressed in the related permit applications where appropriate. A Stormwater Pollution Prevention Plan has been developed for construction projects affecting areas of at least ~~5 acres~~one acre to control soil erosion and contain sediments.

B. Erosion

Vegetative cover is maintained using on-site and contracted services. This includes the application of clay, top soil, fertilizer, hydroseeding and hand seeding. Some berm areas may also be covered with stone or gravel. The use of gabion mats and especially Miramet geotextile fabric has reduced erosion and enhanced vegetative growth.

C. Other Site Roads

Roadways other than those used by waste hauling vehicles will be cleaned and maintained as good housekeeping dictates. In general, the paved roads will be swept as needed, weather permitting. These roads may be wetted down as needed to provide general dust management, adequate visibility and nuisance control.

III. Air Monitoring - Fugitive Dust Emissions

CWM has an Ambient Air Monitoring Program. This program determines the impact, if any, of the hazardous waste activities and other site activities on the surrounding air quality at the Model City facility. This Ambient Air Monitoring Program has been approved by NYSDEC.

A. During RMU-2 Landfill Operations

PM-10 Monitoring

A detailed discussion of the PM-10 monitoring network relative to dust emissions is presented in the PM-10 ~~monitoring system~~Air Monitoring Program QA/QC ~~manual previously~~Manual, initially approved by NYSDEC (H. Sandonato to J. Pizzuto, 9/26/90~~).~~), with subsequent revisions. This monitoring program demonstrates CWM's compliance with the national primary and secondary 24 hour ambient air quality standard for particulate matter (PM-10) of 150 micrograms/cubic meter, 24 hour average concentration. ~~The level of the national primary and secondary annual~~

~~standards for particulate matter is 50 micrograms/cubic meter, annual arithmetic mean.~~

The results of the PM-10 monitoring shall be treated as PM-2.5 and compared to the national primary and secondary 24 hour ambient air quality standard for particulate matter (PM-2.5) of 35 micrograms/cubic meter, 24 hour average concentration. Alternatively, the Permittee may perform a short-term monitoring program using temporary PM-2.5 units co-located at PM-10 monitoring network locations to establish the fraction of the PM-10 results that are PM-2.5.

The fugitive dust control measures discussed in this plan have consistently resulted in particulate matter levels below the ambient air quality standards. If this monitoring network begins to show levels above the standards, CWM will investigate the cause and revise the Fugitive Dust Control Plan, if necessary.

B. Monitoring During Construction

PM-10 Monitoring

In addition to the perimeter network monitoring, the Permittee shall perform continuous real-time PM-10 monitoring proximate to the landfill construction in accordance with the Residuals Management Unit No. 2 (RMU-2) Air Monitoring Plan (RAMP) for Landfill Constriction as required by Attachment N of this Permit. Response Levels and Response Actions shall be as specified in the RAMP.

ATTACHMENT N

Air & Meteorological Monitoring Plan

Revised: 3/16

Air & Meteorological Monitoring Plan

Monitoring Network

A NYSDEC-approved ambient air and meteorological monitoring network shall be operated and maintained at the CWM Model City facility. This program shall consist of a minimum of six (6) monitoring sites established at NYSDEC-approved locations and equipped with sampling devices and other equipment as necessary for ambient air quality and one (1) meteorological monitoring station. Additional monitoring will be required during landfill construction activities.

Air Quality Monitoring During Construction

Air samples shall be obtained from the NYSDEC-approved monitoring network and analyzed for PM-10 in accordance with Methods published by the USEPA. CWM will sample for PM-10 once every six calendar days.

The Permittee shall prepare and submit to the NYSDEC for approval a Residuals Management Unit No. 2 (RMU-2) Air Monitoring Plan (RAMP) for Landfill Construction and Operation prior to initiating landfill construction activities at the facility. The Permittee shall use Appendix 1A and 1B of DER-10 as a guide to prepare the RAMP, and the RAMP must meet all requirements stipulated in the RAMP outline table at the end of this attachment. Additional proximate monitoring for Volatile Organic Compounds (VOCs), dust and Polychlorinated biphenyls (PCBs), shall be performed during landfill construction in accordance with the RAMP.

Response Action Levels and Response Actions shall be as specified in the RAMP. Upon NYSDEC approval, the RAMP is to be considered as incorporated into this Permit by reference, and is binding upon the Permittee and have the same legal force and effect as any other document incorporated by reference into this Permit.

At a minimum, the Permittee shall perform continuous real-time PM-10 monitoring proximate to landfill construction. Additionally, the Permittee shall perform VOC and/or PCB monitoring in accordance with the RAMP for Landfill Construction proximate to the excavation of in-situ soil with known VOC and/or PCB contamination (corrective action areas). The RAMP will specify action levels for PM-10 and PCBs.

Additional requirements for VOC air monitoring during RMU-2 excavations are included in the RMU-2 Soil Excavation Monitoring and Management Plan (SEMMP), which includes the RMU-2 Corrective Action Plan.

Air Quality Monitoring During RMU-2 Operations

The primary operation includes the placement of hazardous and industrial non-hazardous waste into RMU-2. The waste must meet Land Disposal Restriction (LDR) standards which must be verified in accordance with Waste Analysis procedures in Attachment C of this Permit, prior to placement in the landfill. Also, Exhibit G in Schedule 1 of Module I of this Permit bans disposal of putrescible-type waste (i.e., municipal solid waste) and places specific restrictions on the disposal of a number of other waste types.

Air samples shall be obtained from the monitoring network and analyzed for PM-10 in accordance with Methods published by the USEPA during the operational life of RMU-2. CWM will sample for PM-10 once every six calendar days.

The results of the PM-10 monitoring shall be treated as PM-2.5 and compared to the national primary and secondary 24 hour ambient air quality standard for particulate matter (PM-2.5) of 35 micrograms/cubic meter, 24 hour average concentration. Alternatively, the Permittee may perform a short-term monitoring program using temporary PM-2.5 units co-located at PM-10 monitoring network locations to establish the fraction of the PM-10 results that are PM-2.5.

Commencing with the start of waste disposal operations in RMU-2, additional monitoring network air sampling and analysis for VOCs, PCBs and metals shall be performed in accordance with the RAMP. VOCs will be monitored at network locations in accordance with the RAMP. During initial operations, PCB monitoring will be performed to verify that levels at the network locations are not above the action level. A PCB factor will be developed for use in routine monitoring in accordance with the RAMP. Also, during initial operations, metals analysis will be performed on samples collected at network locations. Metals factors will be developed for use in routine monitoring in accordance with the RAMP.

Meteorological Monitoring

Temperature, wind speed and wind direction shall be continuously measured at CWM's on-site meteorological station and recorded. CWM shall also measure and record the date, or dates, duration (in hours) and amount (in inches) of all precipitation events at the facility's meteorological station. Other parameters shall also be measured if deemed necessary by the NYSDEC.

Quality Assurance / Quality Control (QA/QC)

The ambient air and meteorological monitoring network shall be maintained and all sampling and analysis shall be performed in accordance with the November 2000 and any subsequently Department approved revisions of the "CWM Meteorological Monitoring Network - Quality Assurance Project Plan", which is incorporated by reference into this Permit by Condition B in Schedule 1 of Module I of this Permit, and in accordance with the May 2005 and any subsequently Department approved revisions of the "PM-10 Air Monitoring Program QA/QC Manual" and approved RAMP. CWM shall compensate the NYSDEC for the costs incurred in the oversight and validation of the network QA/QC that are reported to CWM. Compensation procedures shall be the same as those specified by Condition E in Schedule 1 of Module I of this Permit for the environmental monitors.

Reporting of Monitoring Data

A monthly report of air monitoring data collected during each calendar month shall be submitted to the Region 9 Air and Solid & Hazardous Materials Engineers within ninety (90) days from the end of each calendar month or in accordance with an alternative Department approved submission schedule. Meteorological monitoring data shall be made available upon request.

March 16, 2016

PROPOSED AIR MONITORING PROGRAM
RESIDUALS MANAGEMENT UNIT NO. 2
CWM CHEMICAL SERVICES, LLC
MODEL CITY, NEW YORK

	Current Operations				RMU-2 Construction (1)				RMU-2 Operations (1)			
	Monitoring	Type	Location	Frequency	Monitoring	Type	Location	Frequency	Monitoring	Type	Location	Frequency
Dust	PM-10	Hi-vol	Network	1/6 days	PM-10 (2)	Hi-vol	Network	1/6 days	PM-10 (2)	Hi-vol	Network	1/6 days
					PM-10 DER-10 (RAMP)	Hand-Held DataRAM™ pDR-1000AN or equivalent	Proximate	Continuous during construction activities				
VOCs	SEMMP	Hand-Held MiniRAE 3000 or equivalent	Proximate	Continuous during excavation activities	DER-10 (RAMP)	Hand-Held MiniRAE 3000 or equivalent	Proximate	Continuous during excavation activities (VOC Contaminated Areas Only)	Method 325A—VOCs from Fugitive and Area Sources (8)	Passive Sorbent	Network	Continuous (2 week sample)
					RMU-2 (SEMMP)	Hand-Held MiniRAE 3000 or equivalent	At soil placement area (berm or stockpile)	Continuous during excavation activities				
PCBs (routine)	-	-	-	-	PM-10 with application of a surrogate for PCBs (3)	Hand-Held DataRAM™ pDR-1000AN or equivalent (for dust)	Proximate	Continuous during construction activities (PCB Contaminated Areas Only)	PM-10 with application of a surrogate for PCBs (4)	Hi-vol	Network	1/6 days
PCBs (confirmation, first month PCBs landfilled in RMU-2)	-	-	-	-	-	-	-	-	PCB by ASTM D 4861	Filter /PUF	Network	1/6 days
Metals (routine)	-	-	-	-	PM-10 (5)	Hand-Held DataRAM™ pDR-1000AN or equivalent (for dust)	Proximate	Continuous during construction activities	PM-10 with application of a surrogate for metals (6)	Hi-vol	Network	1/6 days
Metals (confirmation, first month lead and other toxic metals landfilled in RMU-2)	-	-	-	-	-	-	-	-	analyze PM-10 filter for metals (7)	Hi-vol	Network	1/6 days

Notes:
(1) = Methods and procedures for monitoring for dust, VOCs, PCBs, and metals during construction and operations for RMU-2 will be established in the RMU-2 Air Monitoring Plan (RAMP) to be submitted to the NYSDEC and approved prior to construction.
(2) = CWM may utilize a short-term program with portable PM-2.5 units co-located at various PM-10 monitoring locations to establish what percentage of PM-10 particulates are PM-2.5. Methods and frequency will be established in the RAMP.
(3) = During excavation of areas with PCB contamination, the PCB concentration in the soil will be used to develop a PCB factor to be applied to the PM-10 values as a surrogate for PCB analyses.
A PCB action level of 110 ng/m3 will be included in the RAMP (reference: Hudson River community monitoring program).
(4) = Initial RMU-2 operations: during the first month that bulk PCB contaminated soil/waste is landfilled, PCB sampling will be performed at network locations using PUF samplers. Results will be compared to the PCB action level.
Upwind/downwind results will be compared. PCB PUF results will be used to develop PCB factor for application to PM-10 values as a surrogate for routine PCB analysis.
(5) = No lead or toxic metals contamination expected in areas of RMU-2 cell construction. Lead and other toxic metals will be present in hazardous waste landfilled in RMU-2. Metals analysis to be performed during RMU-2 operations.
(6) = Initial RMU-2 operations: during the first month that bulk lead or other toxic metals contaminated waste is landfilled, metals analysis will be performed on the PM-10 filters collected at the network locations.
Upwind/downwind results will be compared. The values in Air Guide 1 will be reviewed. Metals results will be used to develop lead/metals factors for application to PM-10 values as a surrogate for routine metals analysis.
(7) Total metals analysis for lead and other toxic metals will be performed on PM-10 filters collected at network locations.
Lead and other RCRA toxic metals must be stabilized with CKD to meet the Land Disposal Restrictions standards prior to landfill disposal.
(8) = CWM may petition the NYSDEC for approval of discontinuing the VOC monitoring one-year after the initiation of the program(s)
- = Not Required
Proximate = Monitoring located near construction activities in accordance with DER-10 or RMU-2 Air Monitoring Plan (RAMP)
SEMMP = Generic or Project-Specific Soil Excavation Monitoring and Management Plan in accordance with Condition D of Exhibit B of the 6 NYCRR Part 373 Permit.

ATTACHMENT N

Air & Meteorological Monitoring Plan

[*NOTE: Portions of Attachment N are being modified. Text proposed for addition is indicated in RED, and text proposed for deletion is indicated in ~~STRIKEOUT~~. Tables to be added are identified by a RED NOTE.*]

Air & Meteorological Monitoring Plan

Monitoring Network

A NYSDEC-approved ambient air and meteorological monitoring network shall be operated and maintained at the CWM Model City facility. This program shall consist of a minimum of six (6) monitoring sites established at NYSDEC-approved locations and equipped with sampling devices and other equipment as necessary for ambient air quality and one (1) meteorological monitoring station. Additional monitoring will be required during landfill construction activities.

Air Quality Monitoring During Construction

Air samples shall be obtained from the NYSDEC-approved monitoring network and analyzed for PM-10 in accordance with Methods published by the USEPA. CWM will sample for PM-10 once every six calendar days.

The Permittee shall prepare and submit to the NYSDEC for approval a Residuals Management Unit No. 2 (RMU-2) Air Monitoring Plan (RAMP) for Landfill Construction and Operation prior to initiating landfill construction activities at the facility. The Permittee shall use Appendix 1A and 1B of DER-10 as a guide to prepare the RAMP, and the RAMP must meet all requirements stipulated in the RAMP outline table at the end of this attachment. Additional proximate ~~air sampling and analysis~~monitoring for Volatile Organic Compounds (VOCs), dust and~~/or~~ Polychlorinated biphenyls ~~biphenals~~ (PCBs), shall be performed ~~if deemed necessary~~during landfill construction in accordance with the RAMP.

Response Action Levels and Response Actions shall be as specified in the RAMP. Upon NYSDEC approval, the RAMP is to be considered as incorporated into this Permit by reference, and is binding upon the Permittee and have the same legal force and effect as any other document incorporated by reference into this Permit.

At a minimum, the Permittee shall perform continuous real-time PM-10 monitoring proximate to landfill construction. Additionally, the Permittee shall perform VOC and/or PCB monitoring in accordance with the RAMP for Landfill Construction proximate to the excavation of in-situ soil with known VOC and/or PCB contamination (corrective action areas). The RAMP will specify action levels for PM-10 and PCBs.

Additional requirements for VOC air monitoring during RMU-2 excavations are included in the RMU-2 Soil Excavation Monitoring and Management Plan (SEMMP), which includes the RMU-2 Corrective Action Plan.

Air Quality Monitoring During RMU-2 Operations

The primary operation includes the placement of hazardous and industrial non-hazardous waste into RMU-2. The waste must meet Land Disposal Restriction (LDR) standards which must be

verified in accordance with Waste Analysis procedures in Attachment C of this Permit, prior to placement in the landfill. Also, Exhibit G in Schedule 1 of Module I of this Permit bans disposal of putrescible-type waste (i.e., municipal solid waste) and places specific restrictions on the disposal of a number of other waste types.

Air samples shall be obtained from the monitoring network and analyzed for PM-10 in accordance with Methods published by the ~~NYSDEC~~USEPA during the operational life of RMU-2. CWM will sample for PM-10 once every six calendar days.

The results of the PM-10 monitoring shall be treated as PM-2.5 and compared to the national primary and secondary 24 hour ambient air quality standard for particulate matter (PM-2.5) of 35 micrograms/cubic meter, 24 hour average concentration. Alternatively, the Permittee may perform a short-term monitoring program using temporary PM-2.5 units co-located at PM-10 monitoring network locations to establish the fraction of the PM-10 results that are PM-2.5.

Commencing with the start of waste disposal operations in RMU-2, additional monitoring network air sampling and analysis for VOCs, PCBs and metals shall be performed in accordance with the RAMP. VOCs will be monitored at network locations in accordance with the RAMP. During initial operations, PCB monitoring will be performed to verify that levels at the network locations are not above the action level. A PCB factor will be developed for use in routine monitoring in accordance with the RAMP. Also, during initial operations, metals analysis will be performed on samples collected at network locations. Metals factors will be developed for use in routine monitoring in accordance with the RAMP.

Meteorological Monitoring

Temperature, wind speed and wind direction shall be continuously measured at CWM's~~CWM=s~~ on-site meteorological station and recorded. CWM shall also measure and record the date, or dates, duration (in hours) and amount (in inches) of all precipitation events at the facility's meteorological station. Other parameters shall also be measured if deemed necessary by the NYSDEC.

Quality Assurance / Quality Control (QA/QC)

The ambient air and meteorological monitoring network shall be maintained and all sampling and analysis shall be performed in accordance with the November 2000 and any subsequently Department approved revisions of the "CWM Meteorological Monitoring Network - Quality Assurance Project Plan", which is incorporated by reference into this Permit by **Condition B** in **Schedule 1 of Module I** of this Permit, and in accordance with the May 2005 and any subsequently Department approved revisions of the "PM-10 Air Monitoring Program QA/QC Manual" and approved RAMP. CWM shall compensate the NYSDEC for the costs incurred in the oversight and validation of the network QA/QC that are reported to CWM. Compensation procedures shall be the same as those specified by **Condition E** in **Schedule 1 of Module I** of this Permit for the environmental monitors.

Reporting of Monitoring Data

A monthly report of air monitoring data collected during each calendar month shall be submitted to the Region 9 Air and Solid & Hazardous Materials Engineers within ninety (90) days from the end of each calendar month or in accordance with an alternative Department approved submission schedule. Meteorological monitoring data shall be made available upon request.

March 16, 2016

NOTE: This Page to be Added

PROPOSED AIR MONITORING PROGRAM
RESIDUALS MANAGEMENT UNIT NO. 2
CWM CHEMICAL SERVICES, LLC
MODEL CITY, NEW YORK

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PCBs (confirmation, first month PCBs landfilled in RMU-2)	-	-	-	-	-	-	-	-	PCB by ASTM D 4861	Filter /PUF	Network	1/6 days
Metals (routine)	-	-	-	-	PM-10 (5)	Hand-Held DataRAM™ pDR-1000AN or equivalent (for dust)	Proximate	Continuous during construction activities	PM-10 with application of a surrogate for metals (6)	Hi-vol	Network	1/6 days
Metals (confirmation, first month lead and other toxic metals landfilled in RMU-2)	-	-	-	-	-	-	-	-	analyze PM-10 filter for metals (7)	Hi-vol	Network	1/6 days

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