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

August 18, 2017

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 August 21, 2017 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 August 23, 2017:

- 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: 08/18/2017

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 ("draft ASF Permit Modification") pursuant to Article 19 of the Environmental Conservation Law and Part 201-5 of Title 6 of the New York Codes Rules and Regulations ("6 NYCRR"). The Department has determined CWM is not a major source of criteria or hazardous air pollutants, and has limited actual emissions below major source thresholds of 50 tons per year of Volatile Organic Compounds (VOC), 25 tons per year of total hazardous air pollutants, and 10 tons per year of each individual hazardous air pollutant. Thus, CWM is not subject to major source Title V air permitting, New Source Review permitting, VOC Reasonably Available Control Technology for Major Facilities, or the National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations - 40 CFR 63 Subpart DD.

The facility is subject to certain air emission standards as specified in the CWM's site-wide Part 373 Hazardous Waste Management Permit. To avoid duplication, the draft ASF Permit Modification does not reiterate the air emission control requirements required under 6 NYCRR Part 373 since those are already incorporated into CWM's Part 373 Hazardous Waste Management Permit. Similarly, the draft ASF Permit Modification references certain air monitoring protocols required by that Part 373 permit. Two of those protocols, the Fugitive Dust Control Plan (Attachment L) and the Air & Meteorological Monitoring Plan (Attachment N), are revised to include perimeter monitoring for PM-10 (treated as PM 2.5), use of the air monitoring network to determine compliance with the NAAQS and to include the requirements outlined in the Technical Guidance for Site Investigation and Remediation (DER-10) for construction and operation activities. These revised protocols replace the versions in the draft Part 373 Hazardous Waste Management Permit for the proposed RMU-2 landfill.

Please note that two versions of the Fugitive Dust Control Plan and the Air & Meteorological Monitoring Plan are available for review at the document repositories with the draft ASF Permit Modification. 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 09/22/2017 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 Chemical Services, L.L.C. (CWM), 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. The existing Air State Facility permit includes the Aqueous Waste Treatment Plant (AQWTP); leachate collection, handling and storage for closed Secure Landfills (SLF) 1-6, SLF-7, SLF-10, SLF-11, SLF-12 and RMU-1; waste stabilization operations; and a diesel powered emergency fire pump. This permitting action modifies the existing Air State Facility permit to include the construction and operation of the proposed Residual Management Unit 2 (RMU-2) landfill.

The Department has reviewed CWM's revised Emission Inventory Reports, proposed Toxic-Best Available Control Technology (T-BACT) justification, Air Dispersion Modeling Report, fugitive dust plan, ambient air monitoring plan and application forms in response to the

incomplete notices and have found them acceptable. The Air State Facility permit has been updated to include proposed emission limits and operating restrictions as follows:

CAPPING
Facility-wide emissions will be capped below the applicability thresholds of Title V Air Permitting (6 NYCRR subpart 201-6), Volatile Organic Compound Reasonably Available Control Technology (VOC RACT) for Major Facilities (6 NYCRR subpart 212-3), Non-Attainment New Source Review (6 NYCRR subpart 231-5), and the National Emission Standard for Hazardous Air Pollutants (40 CFR 63 subpart DD) "Off-Site Waste and Recovery Operations" (OSWRO). New permit conditions limit actual emissions of Volatile Organic Compounds (VOC's), Total Hazardous Air Pollutants (HAP's) and Individual HAP's below major source thresholds of 50 ton per year, 25 ton per year and 10 ton per year, respectively. The permit conditions require tracking emissions to ensure that the variations in the waste stream do not cause emissions that exceed major source thresholds.

6 NYCRR PART 212
6 NYCRR Part 212 (Part 212) was revised on June 14, 2015 and updated the risk assessment analysis of toxic contaminants. This version of the application from CWM was received after Part 212 was modified and therefore was subject to review under the revised rule. The permit contains conditions that are considered Toxic-Best Available Control Technology and used to minimize Polychlorinated Biphenyls (PCBs) and Polycyclic Organic Matter (POM) emissions. The permit requires emission tracking to verify compliance with the permit conditions established as part of the Part 212 risk assessment and modeling review.

EPA's AERMOD emission modeling program was used to evaluate the concentrations of contaminants in the ambient air. The model results were compared to the Short-term Guidance Concentrations (SGC) and Annual Guidance Concentrations (AGC) in DAR-1 (Guidelines for the Evaluation and Control of Ambient Air Contaminants under Part 212). The concentration of contaminants, except PCB's, were less than the SGCs and AGCs. Actual PCB's and POM's both exceed the PB Trigger threshold in Part 212. The facility proposed existing requirements, along with new operating and emission limits to cumulatively reduce or limit emissions and be considered Toxic-Best Available Control Technology (T-BACT) for PCB's and POM's. This includes limiting emissions of PCBs and POMs, limiting the VOC concentration of waste stabilized, inspecting and repairing equipment that contacts hazardous waste, limiting the waste stabilized to 140,000 tons a year and the waste disposed in RMU-2 to 500,000 tons per year, restricting the number of hours during which waste can be stabilized and disposed, requiring and maintaining daily cover over the waste, restricting the working face area, requiring the final cover comply with the site-wide Part 373 Permit, limiting emissions from the stabilization baghouses, prohibiting the storage of effluent in facultative ponds 3 and 5 simultaneously, and minimizing emissions from leaks and spills.

The permit requires the calculation and tracking of High Toxicity Air Contaminants (HTACs) and moderately toxic non-HTACs, as defined in Part 212 and DAR-1, on a monthly basis. If HTACs exceed their pound per year Mass Emission Limit (MEL) or non-HTACs exceed 100

pounds a year, they must comply with the requirements in Table 4 of Part 212. Emissions of all non-HTAC emissions are limited to no more than 10 pounds per hour to stay below the emission control threshold in table 4 of Part 212. The AERMOD air dispersion modeling determined that the maximum off-site concentrations were less than the respective SGCs and AGCs listed in DAR-1.

PARTICULATE EMISSIONS (PM-10 AND PM-2.5)
The potential emissions of particulate matter less than 10 microns in diameter (PM-10) and particulate matter less than 2.5 microns in diameter (PM-2.5) from the facility, including the RMU-2 project, are each less than 12 tons per year and therefore not subject to review under Commissioners Policy 33, 'Assessing and Mitigating Impacts of Fine Particulate Matter Emissions' which is applicable to projects emitting 15 tons per year or more. Particulate emissions are controlled at the stabilization process with fabric filters and a fugitive dust plan minimizes the impact from landfill operations.

STABILIZATION BAGHOUSES
Permit conditions were added to ensure the stabilization baghouses are operating properly and complying with regulatory requirements. The baghouses must meet a 99% degree of air cleaning requirement in table 3 of Part 212. A compliance test is required to evaluate the particulate control efficiency of these baghouses. The permit requires the baghouses to operate within a specified pressure differential range. The baghouses are subject to a 20% opacity requirement in the permit. Daily visible emission observations of both baghouses are required when they operate.

6 NYCRR PART 373 REFERENCES
The facility is subject to certain air emission standards as specified in the facility's site-wide Part 373 Hazardous Waste Management Permit. The regulations include 6 NYCRR Part 373-2.28 Air Emission Standards for Equipment Leaks and 6 NYCRR Part 373-2.29 Air Emission Standards for Tanks, Surface Impoundments, and Containers. Accordingly, the site-wide Part 373 Hazardous Waste Management Permit includes the following air monitoring protocols:

(a) Fugitive Dust Control Plan, Attachment L of the Part 373 permit;
(b) Air & Meteorological Monitoring Plan, Attachment N of the Part 373 permit;
(c) Stabilization Operations and Maintenance Manual;
(d) Compliance Program for Air Emission Standards for Equipment Leaks (Subpart BB);
(e) Aqueous Wastewater Treatment System Operations and Maintenance Manual; and
(f) Compliance Program Air Emission Standards for Tanks, Surface Impoundments and Containers (Subpart CC).

To avoid duplication, the Air State Facility permit does not reiterate the air emission control requirements required under Part 373 since those are already incorporated into CWM's Part 373 Hazardous Waste Management permit. Similarly, the Air State Facility permit references certain the air monitoring protocols required by that Part 373 permit. Two of those protocols, however, the Fugitive Dust Control Plan (Attachment L), and the Air & Meteorological Monitoring Plan (Attachment N) have been revised to include perimeter monitoring for PM-10 (treated as

PM-2.5), use of the air monitoring network to determine compliance with the NAAQS and to include the requirements outlined in the Technical Guidance for Site Investigation and Remediation (DER-10) for construction and operation activities. Accordingly, the two revised protocols replace the versions in the draft Part 373 Hazardous Waste Management permit for the proposed RMU-2 landfill.

BOILERS
CWM replaced the distillate oil fired boilers with propane units in 2015, which are exempt from permitting. All reference to the older units and related conditions have been removed.

EMERGENCY ENGINE
The facility has one existing emergency engine, 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. It is exempt from air permitting.

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

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 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.

Item1-1.2:
The permittee must submit a renewal application at least 180 days before the expiration of permits for 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

Mod 0 Permit Effective Date: 10/24/2014 Permit Expiration Date: 10/23/2024

Mod 1 Permit Effective Date: Permit Expiration Date:

PAGE LOCATION OF CONDITIONS

43 19 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
44 20 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=1-LEACH
47 1-28 6 NYCRR 212-2.1: Compliance Demonstration
48 1-29 6 NYCRR 212-2.1: Compliance Demonstration

EU=2-LANDF
49 1-30 6 NYCRR 212-2.1: Compliance Demonstration

NOTE: * preceding the condition number indicates capping.

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: **Maintenance of Equipment**
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 200.7

Item 1-1.1:
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.

Condition 1-2: Facility Permissible Emissions
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-2.1:
The sum of emissions from the emission units specified in this permit shall not equal or exceed the following
Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 000075-09-2 (From Mod 1) PTE: 20,000 pounds per year
Name: DICHLOROMETHANE

CAS No: 0NY100-00-0 (From Mod 1) PTE: 50,000 pounds per year
Name: TOTAL HAP

CAS No: 0NY998-00-0 (From Mod 1) PTE: 100,000 pounds per year
Name: VOC

Condition 1-3: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-3.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
40 CFR Part 63, Subpart DD

Item 1-3.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-3.3:
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.

Item 1-3.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-3.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-3.6:
The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 000075-09-2 DICHLOROMETHANE

Item 1-3.7:
Compliance Demonstration shall include the following monitoring:

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

Individual HAP Cap below 10 tons

1.) Facility wide emissions of each individual Hazardous Air Pollutant (HAP) shall remain less than 10 tons during any 12-consecutive month period. This will cap individual HAP emissions below the major source threshold for Title V permitting and the National Emission Standard for Hazardous Air Pollutants (40 CFR 63 subpart DD), “Off-Site Waste and Recovery Operations” (OSWRO) regulation.

2.) Emissions from stabilization and RMU-2 must be updated monthly based on current information. Emissions from these two sources are expected to vary more than other sources at the facility. The other sources may use the most recent Emission Inventory Report (May 2017) emissions as defaults, unless updated data would change the emissions.
Dichloromethane (Methylene Chloride) is the only HAP listed in this condition because it has the largest emission potential, 840 pounds per year. It is a place holder that represents all of the individual HAP’s emitted by the facility that shall remain less than 10 tons per year. These potential emissions are based on past actual waste

contamination that was extrapolated to the waste disposal and stabilization limits in this permit. Individual HAP emissions need to be calculated because the contamination of future waste could be greater than in the past and generate more emissions.

3.) Stabilization

a.) Waste that contains 500 ppm or more of VOC's shall not be stabilized, in accordance with 40 CFR Part 264 Subpart CC. The stabilization process occurs in steel lined pits that are considered tanks for 40 CFR Part 264 Subpart CC purposes and do not have VOC controls. To ensure compliance with the 500 ppm VOC limit, CWM requires the waste generator to provide the volatile organic information to the CWM Waste Approval Manager for approval before it is shipped to the site. Wastes are managed according to the Waste Analysis Plan in the Site-wide Part 373 Permit.

b.) Emissions of volatile HAPs from stabilization are calculated from the concentration of HAP in the waste, the mass of waste and an emission factor for each load stabilized. Volatile Organic Compounds are listed in Appendix VI of 40 CFR Part 265 . Volatile chemicals use an emission factor of 1, which assumes 100% of the chemical evaporates during the stabilization. Chemicals that are not classified as volatile use an emission factor of 0.5, which assumes that 50% of the chemical evaporates during stabilization. Polycyclic Organic Matter (POMs) may use an average emission factor of 0.75, which assumes 75% of POMs evaporate during stabilization or may use the appropriate volatile or non-volatile emission factor for each individual compound. POMs are a mix of volatile and non-volatile chemicals.

c.) All particulate emissions from stabilization will be considered HAP particulates. The particulate emissions from the May 2017 Emissions Inventory Reports can be used as the default. Emission calculations shall be updated if there is information that emissions may be higher than in the May 2017 calculations.

4.) RMU-2

Emissions from RMU-2 are calculated from the active land fill area, the area with daily cover, the area with interim final cover, and the area with a final cover.

a.) The active landfill area emissions are calculated with the chemical concentrations, quantity of waste disposed and methods in Section 8.4, Open Landfills and Wastepiles, of EPA's Air Emission Models for Waste and Wastewater document, dated November 1994 (EPA 453 R-94-080A). Emissions are based on an 8 hours day, 6 days a week. Once waste disposal ends each day a daily cover material, such as Posi Shell, is applied.

b.) Emissions from the landfill with a daily cover are calculated from the chemical concentrations in waste using methods in Section 8.2, Closed Landfills, of the above EPA document. Emissions are based on a 16 hour day, 6 days a week and all day Sunday.

c.) Emissions from the landfill with an interim final cover or final cover are calculated from the chemical concentrations in waste

using methods in Section 8.2, Closed Landfills, of the above EPA document. Emissions are based on a 24 hour day.

5.) All records supporting the emission calculations, along with the calculations shall be kept on site for at least 5 years.

6.) The monthly emission totals and 12-month rolling total emissions **shall be reported annually and compared to the cap in Item 1.**

Parameter Monitored: DICHLOROMETHANE
Upper Permit Limit: 19999 pounds
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 1-4: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-4.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
6 NYCRR 212-3.1 (a)
6 NYCRR Subpart 231-5
40 CFR Part 63, Subpart DD

Item 1-4.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-4.3:
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.

Item 1-4.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-4.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-4.6:
The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0	TOTAL HAP
CAS No: 0NY075-02-5	PM 2.5
CAS No: 0NY998-00-0	VOC

Item 1-4.7:
Compliance Demonstration shall include the following monitoring:

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

140,000 ton Stabilization Limit

1.) No more than 140,000 tons of waste may be stabilized at the stabilization facility during any 12-consecutive month period. This stabilization limit, plus the 500,000 ton per year waste disposal limit in this permit and the Site-wide Part 373 Permit, restricts the project emission increase of Particulate Matter less than 2.5 microns in diameter (PM 2.5) from the addition of RMU-2, below the 15 ton per year applicability threshold of Commissioners Policy 33, Assessing and Mitigating Impacts of Fine Particulate Matter Emissions.

This stabilization limit plus the requirements of 6 NYCRR Part 212, "General Process Sources", regulation, along with the Site-wide Part 373 Permit limits, and the 40 CFR 264, Subpart CC (Air Emission Standards for Tanks, Surface Impoundments, and Containers) restrictions will also insure that the emissions of VOCs and HAPs from the whole facility will not exceed the applicability requirements of the following rules: major facility applicability thresholds of Title V air permitting, 6 NYCRR Part 231 "New Source Review", 6 NYCRR subpart 212-3 Major Source VOC RACT and National Emission Standard for Hazardous Air Pollutants (40 CFR 63 subpart DD)"Off-Site Waste and Recovery Operations" (OSWRO).

2.) The mass of waste stabilized will be tracked daily and summed monthly to calculate the 12-month rolling total.

3.) All records supporting the calculations, along with the calculations shall be kept on site for at least 5 years.

4.) The monthly total and 12-month rolling total shall be reported annually.

Parameter Monitored: WASTE MATERIAL
Upper Permit Limit: 140,000 tons
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 1-5: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-5.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
40 CFR Part 63, Subpart DD

Item 1-5.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-5.3:
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.

Item 1-5.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-5.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-5.6:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-5.7:
Compliance Demonstration shall include the following monitoring:

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

Total HAP Cap below 25 tons

1.) Facility wide total hazardous air pollutant (HAP) emissions shall remain less than 25 tons during any 12-consecutive month period. This will cap total HAP emissions below the major source threshold for Title V permitting and the National Emission Standard for Hazardous Air Pollutants (40 CFR 63 subpart DD), "Off-Site Waste and Recovery Operations" (OSWRO) regulation.

2.) Emissions from stabilization and RMU-2 must be updated monthly based on current information. Emissions from these two sources are expected to vary more than other sources at the facility. The other sources may use the most recent Emission Inventory Report (May 2017) emissions as defaults, unless updated data would change the emissions.

3.) STABILIZATION:
a.) Waste that contains 500 ppm or more of VOC's shall not be stabilized, in accordance with 40 CFR Part 264 Subpart CC. The stabilization process occurs in steel lined pits that are considered tanks for 40 CFR Part 264 Subpart CC purposes and do not have VOC controls. To ensure compliance with the 500 ppm VOC limit, CWM requires the waste generator to provide the volatile organic information to the CWM Waste Approval Manager for approval before it is shipped to the site. Wastes are managed according to the Waste Analysis Plan in the Site-wide Part 373 Permit.

b.) Emissions of volatile HAPs from stabilization are calculated from the concentration of HAP in the waste, the mass of waste and an emission factor for each load stabilized. Volatile Organic Compounds are listed in Appendix VI of 40 CFR Part 265. Volatile chemicals use an emission factor of 1, which assumes 100% of the chemical evaporates during the stabilization. Chemicals that are not classified as volatile use an emission factor of 0.5, which assumes that 50% of the chemical evaporates during stabilization. Polycyclic Organic Matter (POMs) may use an average emission factor of 0.75, which assumes 75% of POMs evaporate during stabilization or may use the appropriate volatile or non-volatile emission factor for each individual compound. POMs are a mix of volatile and non-volatile chemicals.

c.) All particulate emissions from stabilization will be considered HAP particulates. The particulate emissions from the May 2017 Emission Inventory Reports can be used as the default. Emission calculations shall be updated if there is information that emissions may be higher

than in the May 2017 calculations.

4.) RMU-2
Emissions from RMU-2 are calculated from the active land fill area, the area with daily cover, the area with interim final cover, and the area with a final cover.
a.) The active landfill area emissions are calculated with the chemical concentrations, quantity of waste disposed and methods in Section 8.4, Open Landfills and Wastepiles, of EPA's Air Emission Models for Waste and Wastewater document, dated November 1994 (EPA 453 R-94-080A). Emissions are based on an 8 hours day, 6 days a week. Once waste disposal ends each day a daily cover material, such as Posi Shell, is applied.
b.) Emissions from the landfill with a daily cover are calculated from the chemical concentrations in waste using methods in Section 8.2, Closed Landfills, of the above EPA document. Emissions are based on a 16 hour day, 6 days a week and all day Sunday.
c.) Emissions from the landfill with an interim final cover or final cover are calculated from the chemical concentrations in waste using methods in Section 8.2, Closed Landfills, of the above EPA document. Emissions are based on a 24 hour day.

5.) All records supporting the emission calculations, along with the calculations shall be kept on site for at least 5 years.

6.) The monthyl emission totals and 12-month rolling total emissions **shall be reported annually and compared to the cap in item 1.**

Parameter Monitored: TOTAL HAP
Upper Permit Limit: 49999 pounds
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 1-6: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-6.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
6 NYCRR 212-3.1 (a)
6 NYCRR 212-3.1 (a) (1)
6 NYCRR Subpart 231-5

Item 1-6.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-6.3:
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.

Item 1-6.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-6.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-6.6:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-6.7:
Compliance Demonstration shall include the following monitoring:

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

VOC Cap below 50 tons

1.) Facility wide Volatile Organic Compound (VOC) emissions shall remain less than 50 tons during any 12-consecutive month period. This will cap VOC emissions below the major source threshold for Title V, New Source Review, and Volatile Organic Compound Reasonably Available Control Requirements (VOC RACT) permitting.

2.) Emissions from stabilization and RMU-2 must be updated monthly based on current information. Emissions from these two sources are expected to vary more than other sources at the facility. The other sources may use the most recent Emission Inventory Report (May 2017) emissions as defaults, unless updated data would change the emissions.

3.) STABILIZATION

a.) Waste that contains 500 ppm or more of VOC's shall not be stabilized, in accordance with 40 CFR Part 264 Subpart CC. The stabilization process occurs in steel lined pits that are considered tanks for 40 CFR Part 264 Subpart CC purposes and do not have VOC controls. To ensure compliance with the 500 ppm VOC limit, CWM requires the waste generator to provide the volatile organic information to the CWM Waste Approval Manager for approval before it is shipped to the site. Wastes are managed according to the Waste Analysis Plan in the Site-wide Part 373 Permit.

b.) Emissions of VOC's from stabilization are calculated from the concentration of VOC's in the waste, the mass of waste and an emission factor for each load stabilized. Volatile Organic Compounds are listed in Appendix VI of 40 CFR Part 265. Volatile chemicals use an emission factor of 1, which assumes 100% of the chemical evaporates during the stabilization. Chemicals that are not classified as volatile use an emission factor of 0.5, which assumes that 50% of the chemical evaporates during stabilization. Polycyclic Organic Matter (POMs) may use an average emission factor of 0.75, which assumes 75% of POMs evaporate during stabilization or may use the appropriate volatile or non-volatile emission factor for each individual compound. POMs are a mix of volatile and non-volatile chemicals.

4.) RMU-2

Emissions from RMU-2 are calculated from the active land fill area, the area with daily cover, the area with interim final cover, and the area with a final cover.

a.) The active landfill area emissions are calculated with the chemical concentrations, quantity of waste disposed and methods in Section 8.4 Open Landfills and Wastepiles of EPA's Air Emission Models for Waste and Wastewater document, dated November 1994 (EPA 453 R-94-080A). Emissions are based on an 8 hours day, 6 days a week. Once waste disposal ends each day a daily cover material, such as Posi Shell, is applied.

b.) Emissions from the landfill with a daily cover are calculated from the chemical concentrations in waste using methods in Section 8.2, Closed Landfills, of the above EPA document. Emissions are based on a 16 hour day, 6 days a week and all day Sunday.

c.) Emissions from the landfill with an interim final cover or final cover are calculated from the chemical concentrations in waste using methods in Section 8.2, Closed Landfills, of the above EPA document. Emissions are based on a 24 hour day.

5.) All records supporting the emission calculations, along with the calculations shall be kept on site for at least 5 years.

6.) The monthyl emission totals and 12-month rolling total emissions **shall be reported annually and compared to the cap in item 1.**

Parameter Monitored: VOC

Upper Permit Limit: 99999 pounds
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 1-7: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-7.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
6 NYCRR 212-3.1 (a)
6 NYCRR Subpart 231-5
40 CFR Part 63, Subpart DD

Item 1-7.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-7.3:
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.

Item 1-7.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-7.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-7.6:
The Compliance Demonstration activity will be performed for the Facility.

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

CAS No: 0NY075-02-5 PM 2.5
CAS No: 0NY998-00-0 VOC

Item 1-7.7:
Compliance Demonstration shall include the following monitoring:

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

500,000 ton Waste Disposal Limit for RMU-2

1.) No more than 500,000 tons of waste may be disposed in RMU-2 annually. This disposal limit plus the 140,000 ton per year stabilization limit in this permit restricts the project emission increase of Particulate Matter less than 2.5 microns in diameter (PM 2.5) from the addition of RMU-2, below the 15 ton per year applicability threshold of Commissioners Policy 33, Assessing and Mitigating Impacts of Fine Particulate Matter Emissions.
This waste disposal limit plus the requirements of 6 NYCRR Part 212, "General Process Sources", regulation, along with the Site-Wide Part 373 Permit limits, and the 40 CFR 264, Subpart CC (Air Emission Standards for Tanks, Surface Impoundments, and Containers) restrictions will also insure that the emissions of VOCs and HAPs from the whole facility will not exceed the applicability requirements of the following rules: major facility applicability thresholds of Title V air permitting, 6NYCRR Part 231 "New Source Review", 6 NYCRR subpart 212-3 Major Source VOC RACT and National Emission Standard for Hazardous Air Pollutants (40 CFR 63 subpart DD)"Off-Site Waste and Recovery Operations" (OSWRO).

2.) The mass of waste disposed will be tracked daily and summed monthly to calculate the 12-month annual limit.

3.) All records supporting the calculations, along with the calculations shall be kept on site for at least 5 years.

4.) The monthly total and annual total shall be reported annually.

Parameter Monitored: WASTE MATERIAL
Upper Permit Limit: 500,000 tons
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 1: Air pollution prohibited
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 211.1

Item 1.1:
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

Applicable Federal Requirement:6 NYCRR 212-1.5 (d)

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

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

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Emissions from Leaks and Spills

1.) Best practices are used for the containment and prevention of leaks and spills from containers and drums at the facility. This includes following the requirements of 40 CFR Part 373-2.29, subpart CC, which specifies work practices to minimize air emissions.

2.) Containers will be inspected, documented and reported as required by CWM's RCRA Subpart CC Compliance Manual.

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 212-1.5 (d)

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

Regulated Contaminant(s):
CAS No: 001336-36-3 POLYCHLORINATED BIPHENYL

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

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

PCB Emissions are Limited to 28.9 lb/yr

1.) Facility-wide PCB emissions are limited to 28.9 pounds per 12-month period. This limit supports the Toxic Best Available Control Technology (T-BACT) determination and was used in the air dispersion modeling.

2.) PCB emissions from stabilization and RMU-2 must be updated monthly based on current information. Emissions from these two sources are expected to vary more than other sources at the facility. Emissions provided in the most recent Emission Inventory Reports (May 2017) may be used as defaults for the rest of the emission sources at the facility, unless updated data would change the emissions.

3. Individual PCB Aroclor's will be tracked and their emission rates may not exceed those used in the Department accepted Air Dispersion Model dated June 1, 2017.

4.) Records of the monthly and 12-monthly rolling total emissions shall be kept on site for at least 5 years.

5.) The monthly and 12-month rolling total emissions shall be reported annually and compared to the limit in item 1.

Parameter Monitored: POLYCHLORINATED BIPHENYL
Upper Permit Limit: 28.9 pounds per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

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

Applicable Federal Requirement:6 NYCRR 212-1.5 (d)

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

Regulated Contaminant(s):
CAS No: 0NY505-00-0 POLYCYCLIC ORGANIC MATTER (POM)

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

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

Monitoring Description:

POM Emissions are Limited to 146.4 lb/yr

1.) Facility-wide Polycyclic Organic Matter (POM) emissions are limited to 146.4 pounds per 12-month period. This limit supports the Toxic Best Available Control Technology (T-BACT) determination and was part of the emissions used in the air dispersion modeling.

2.) POM emissions from stabilization and RMU-2 must be updated monthly based on current information. Emissions from these two sources are expected to vary more than other sources at the facility. Emissions provided in the most recent Emission Inventory Reports (May 2017) may be used as defaults for the rest of the emission sources at the facility, unless updated data would change the emissions.

3.) Records of the monthly and 12-monthly rolling total emissions shall be kept on site for at least 5 years.

4.) The monthly and 12-month rolling total emissions shall be reported annually and compared to the limit in item 1.

Parameter Monitored: POLYCYCLIC ORGANIC MATTER (POM)
Upper Permit Limit: 146.4 pounds per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 60 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 1-11: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-1.5 (d)

Item 1-11.1:
The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY505-00-0 POLYCYCLIC ORGANIC MATTER (POM)
CAS No: 001336-36-3 POLYCHLORINATED BIPHENYL

Item 1-11.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

T-BACT determination for PCB’s and POM’s

1. The emission rate potential of Polychlorinated Biphenyls (PCBs) and polycyclic organic matter (POM) each exceed the Persistent and

Bioaccumulative Trigger (PB Trigger) of 10 pounds per year in Table 2 of 6 NYCRR Part 212-2. Both PCB's and POM's were assigned an environmental rating of A according to 6 NYCRR Part 212-1.3. A-rated contaminants that exceed the PB Trigger are required to install 90% control, per Table 4 in 6 NYCRR Part 212. The facility demonstrated to the satisfaction of the department that Toxic-Best Available Control Technology (T-BACT) is in place for these contaminants. T-BACT allows the use of a less restrictive degree of air cleaning than required in Table 4.

2.) The T-BACT determination is based on the cumulative emission reductions or limitations provided below along with the results of an air dispersion modelling analysis:

a. The air dispersion model results show that the ambient air concentrations of the more persistent PCBs (PCB Aroclors 1248 and higher, combined) are well within the risk management range guidelines outlined in DAR-1 (Guidelines for the Evaluation and Control of Ambient Air Contaminants under Part 212). The modeled concentration at the fence line is 1.23 times the Annual Guideline Concentration (AGC). The AGC is established at a one in a million excess cancer risk. The excess cancer risk for PCB's is 1.23 excess cancer cases per one million individuals. Section F of DAR-1 explains that the department may accept an excess cancer risk of up to ten times the AGC when a facility has employed T-BACT. It is the practice to group the more persistent PCBs (PCB 1248 and higher) and less persistent PCBs (PCBs less than 1248) separately when evaluating offsite impacts.

b. Using an air dispersion model analysis to conclude that the ambient air concentrations of less persistent PCBs (PCB Aroclors below 1248, combined) and POMs are below the acceptable Annual Guidance Concentrations in the department's DAR-1 policy.

c. Limiting facility-wide PCB emissions to 28.9 pounds a year. This limit is a separate permit conditions in this air permit, under citation 6 NYCRR Part 212-1.5(d).

d. Limiting facility-wide POM emissions to 146.4 pounds a year. This limit is a separate permit conditions in this air permit, under citation 6 NYCRR Part 212-1.5(d).

e. Prohibiting waste that contains more than 500 parts per million of VOC's from being stabilized without VOC emission controls. The 500 ppm limit is from the 6 NYCRR Part 373-2.29 and 40 CFR Part 264 Sections 1080 through 1091 (Subpart CC). Part 373-2.29 and Subpart CC apply to tanks, containers and surface impoundments. The steel lined stabilization pits are considered tanks for Subpart CC. The requirements are part of CWM's Site-wide Part 373 Permit.

f. Conducting inspections and repairs of equipment that contains or contacts a hazardous waste with an organic concentration that equals or exceeds 10 percent by weight as required by the Air Emission Standards in 6 NYCRR 373-2.28 and 40 CFR 264.1050-1065 (Subpart BB).

The requirements are part of CWM's Site-wide Part 373 Permit.

g. Limiting the waste that can be stabilized during any 12-month period to no more than 140,000 tons annually. This is a limit in this air permit.

h. Limiting the waste that can be disposed in RMU-2 to no more than 500,000 tons annually. This is a limit in this air permit and the Site-wide Part 373 Permit.

i. Restricting the hours for placing waste in RMU-2 and for stabilizing waste, each, to 8 hours a day, Monday through Saturday excluding Holidays, within the constraints of the Site-Wide Part 373 Permit. Both limitations are separate permit conditions in this air permit, under citation 6 NYCRR Part 212-1.5(d).

j. Requiring that daily cover material will be applied over the working face waste area and that the cover material be continuously maintained over the active/non-working face waste region (Interim Cover Area) in accordance with the Site-wide Part 373 Permit.

k. Restricting the working face of RMU-2 to 1.7 acres.

l. Requiring that a synthetic liner be part of the final RMU-2 landfill cover system after reaching final waste grades, in accordance with the Site-wide Part 373 Permit.

m. Requiring the stabilization baghouses to be at least 99% efficient at collecting particulates.

n. Requiring the stabilization baghouses to operate within the designed pressure drop of the filter system.

o. Prohibiting the storage of effluent from the aqueous waste treatment plant in Fac Pond 3 and Fac Pond 5 simultaneously.

p. Requiring the use of best practices for the containment/prevention of leaking containers/drums on site.

3) MONITORING of the above limitations is summarized below:

a. Facility-wide PCB and POM emissions will be calculated monthly using the methods in the May 2017 emission calculations. The most emission variability is expected from the stabilization operation and from RMU-2, so these emissions must be updated monthly based on current information. The facility may use the emissions provided in the May 2017 application as defaults for the rest of the emission sources, unless updated data is obtained that shows a change in emissions. Tracking High Toxicity Air Contaminant (HTAC's) emissions according to CWM's Standard Division Practice (SDP 5000).

b. The waste generator submits a Hazardous Waste Profile that documents if the volatile organic content of the waste is less than

500 ppm or not, as part of the waste approval process described in CWM's Subpart CC Compliance Manual.

c. The facility will record the inspection, maintenance and repair of all equipment that contains or contacts a hazardous waste with an organic concentration that equals or exceeds 10 percent by weight, as required by the Air Emission Standards in 6 NYCRR 373-2.28 and 40 CFR 264 (Subpart BB) and specified in the Site-wide Part 373 Permit.

d. The 140,000 ton annual stabilization limit will be tracked as specified elsewhere in this air permit.

e. The 500,000 ton annual limit on waste disposal will be tracked as specified elsewhere in this air permit.

f. The hours per day and days per week of stabilization operations and of waste disposal operations will be tracked as specified elsewhere in this air permit.

g. The application of daily cover material over the working face region waste will be monitored and tracked as specified elsewhere in this air permit.

h. The cover material over the active/non-working face waste region (Interim Cover Area) is inspected daily. The cover inspection and any maintenance is documented in the daily inspection report in accordance with the Site-wide Part 373 Permit.

i. Construction inspection of the final landfill cover system will document the use of a synthetic liner as part of the cover, in accordance with the Site-wide Part 373 Permit.

j. The RMU-2 waste disposal area will be determined daily as required elsewhere in this permit.

k. Visible emission observations will be made daily to evaluate the efficiency of the stabilization baghouses as required elsewhere in this permit.

l. A particulate collection efficiency test will be conducted on each stabilization baghouse as required elsewhere in this permit.

m. The pressure differential across the stabilization baghouses will be monitored each day they operate, as required elsewhere in this permit.

n. The contents of Fac Ponds 3 and 5 will be recorded as required elsewhere in this permit.

o. Leaks and spills from containers and drums will be monitored and minimized by following best practices procedures, as required elsewhere in this permit.

4) RECORD KEEPING
Records shall be kept as required by the applicable permit conditions in this permit and the Site-wide Part 373 Operating Permit (RCRA).

5) REPORTING
Reporting details are in the individual permit conditions for the above restrictions and limitations.

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

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

Condition 1-12: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-1.5 (d)

Item 1-12.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-AQWTP

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

Item 1-12.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Aqueous Waste Treatment Plant
Operation and Monitoring Requirements

1.) Tanks containing hazardous waste with >500 ppm VOCs, as listed in the facility's Site-wide Part 373 (RCRA) Permit, are subject to 6 NYCRR 373-2.29, Air Emission Standards for Tanks, Containers and Surface Impoundments. As required by Part 373-2.29, 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 1-13: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-1.5 (d)

Item 1-13.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-AQWTP

Item 1-13.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

T-BACT for PCB's and POM's from Fac Ponds 3 and 5

1.) The facility may not store effluent from the Aqueous Waste Treatment Plant (AWTP) in Facultative (Fac) Pond 3 and Fac Pond 5 at the same time.

2.) The date that Fac Pond 3 no longer contains effluent from the AWTP and the date that effluent is first discharged to Fac Pond 5 shall be recorded. These records must be made available upon request.

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

Condition 1-14: Compliance Demonstration
Effective for entire length of Permit

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

Replaces Condition(s) 5

Item 1-14.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FRPMP

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

Item 1-14.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Emergency Engine - Maintenance Requirements

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

(rated at 187 bhp) by following maintenance procedures from Item 4 in Table 2d of 40 CFR 63 subpart ZZZZ:

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 1-15: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.6625, Subpart ZZZZ

Replaces Condition(s) 6

Item 1-15.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FRPMP

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

Item 1-15.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Emergency Engine - Operating 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 1-16: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.6640, Subpart ZZZZ

Replaces Condition(s) 7

Item 1-16.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-FRPMP

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

Item 1-16.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Emergency Engine - Operating Requirements

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

2.) May operate up to 100 hr/yr for maintenance and testing.

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 1-17: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 200.7

Item 1-17.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-STABL

Item 1-17.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Stabilization Baghouse Monthly Inspection Requirements

1.) The facility shall perform a monthly visual inspection of the baghouse control equipment used by the stabilization facility in accordance with the Operation & Maintenance Manual for the Stabilization Facility. Upon inspection, any damaged or defective bags and equipment shall be replaced. If the bags are caked with dust, a change out shall be performed.

2.) A record of the inspection findings and any necessary corrective action shall be placed in the Operating Record and made available upon request.

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

Condition 1-18: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-1.5 (d)

Item 1-18.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-STABL

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

Item 1-18.2:
Compliance Demonstration shall include the following monitoring:

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

Stabilization Operations Limited to 8 Hours a Day

1.) Waste may be stabilized for up to 8 hours a day, Monday through Saturday excluding Holidays, within the constraints of the Site-wide Part 373 Permit. This requirement will limit emissions from the stabilization operation.

2.) The times shall be recorded when the stabilization process starts and ends daily.

3.) The above times shall be kept in a log and made available upon request.

4.) If the above time frames are not met then the facility shall adjust the emission calculations accordingly.

Parameter Monitored: OPERATING HOURS
Upper Permit Limit: 8 hours each day
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-19: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 1-19.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-STABL

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 1-19.2:
Compliance Demonstration shall include the following monitoring:

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

20% Opacity Standard for Stabilization Baghouses

1.) No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

2.) An EPA Method 9 Visible Emission Evaluation shall be conducted upon request.

3.) Records shall be made as required by Method 9 and submitted upon request.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-20: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-2.3 (a)

Item 1-20.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-STABL

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 1-20.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Stabilization Baghouses
Daily Visible Emission Monitoring

1.) A visual emission evaluation shall be made each day the baghouses

operate. No visible emissions are expected from dust control system with a 99% control efficiency. The inspection shall be completed in accordance with the Inspection Plan as specified in the facility's Site-wide Part 373 Permit.

2.) If visible emissions are observed, corrective action shall be taken immediately. If visible emissions are present after the corrective action is taken, the process will stop and a more detailed evaluation of the control equipment problem will be performed and the Department contacted.

3.) Visible emission observations shall be recorded and made available upon request.

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

Condition 1-21: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-2.3 (a)

Item 1-21.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-STABL

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 1-21.2:
Compliance Demonstration shall include the following monitoring:

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

Pressure Differential Across the Stabilization Baghouses

1.) The pressure differential across the filters of each stabilization baghouse shall be between 0.5 and 8 inches of water.

2.) The pressure differential shall be recorded daily, while operating, and made available upon request.

Parameter Monitored: PRESSURE
Lower Permit Limit: 0.5 inches of water
Upper Permit Limit: 8 inches of water
Monitoring Frequency: DAILY
Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-22: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-2.3 (a)

Item 1-22.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-STABL

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 1-22.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

Stabilization Baghouses
99% Particulate Control Efficiency

1.) Both baghouses exhausting the stabilization operation must meet the 99% efficiency requirement for collecting particulate emissions in Table 3 of 6 NYCRR Part 212-2. All particulate emissions from the stabilization baghouses, which includes PCB's, POM's and metals, are treated as A rated contaminants. The current baghouses have a manufacturer rated efficiency of 99.99%.

2.) Compliance Testing
a.) A control efficiency compliance test must be conducted on both dust control systems within 180 calendar days of RMU-2 initially receiving and stabilizing waste.
b.) A sampling protocol shall be submitted at least 30 days before the scheduled test date.
c.) The test report shall be submitted within 45 days of testing.

Upper Permit Limit: 99 percent degree of air cleaning or greater
Reference Test Method: EPA Method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-23: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-1.5 (d)

Item 1-23.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 2-LANDF

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

Item 1-23.2:
Compliance Demonstration shall include the following monitoring:

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

RMU-2 Waste Disposal Limited to 8 Hours a Day

1.) The facility may place waste in RMU-2 for up to 8 hours a day, Monday through Saturday excluding Holidays, within the constraints of the Site-wide Part 373 Permit. A daily cover, such as Posi-Shell, will be applied when waste disposal has been completed each day. These requirements will limit emissions from the open face of the landfill.

2.) The times shall be recorded when the first waste is disposed daily and when the daily cover is applied that day.

3.) The above times shall be kept in a log and made available upon request.

4.) If the above time frames are not met then the facility shall adjust the emission calculations accordingly.

Parameter Monitored: OPERATING HOURS
Upper Permit Limit: 8 hours each day
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-24: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 212-1.5 (d)

Item 1-24.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 2-LANDF

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

Item 1-24.2:
Compliance Demonstration shall include the following monitoring:

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

RMU-2 Operating Face Limited to 1.7 acres

1.) The operating face of RMU-2 landfill is limited to no more than 1.7 acres at all times. The operating face is the area where waste is actively disposed. This is an operating limit that minimizes emissions and supports the T-BACT demonstration summarized in a separate permit condition under citation 6 NYCRR Part 212-1.5(d) at the facility level.

2.) The facility will determine the area of the operating face daily when waste is being disposed. The area will be recorded and shall be made available to staff upon request.

3.) If the above area limitation is not met, then the facility shall adjust the emission calculations accordingly.

Parameter Monitored: AREA
Upper Permit Limit: 1.7 Acres
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE 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: 000075-09-2
Name: DICHLOROMETHANE

CAS No: 000078-93-3
Name: METHYL ETHYL KETONE

CAS No: 000108-88-3
Name: TOLUENE

CAS No: 001330-20-7
Name: XYLENE, M, O & P MIXT.

CAS No: 001336-36-3
Name: POLYCHLORINATED BIPHENYL

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 0NY075-00-5

Name: PM-10

CAS No: 0NY075-02-5
Name: PM 2.5

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

CAS No: 0NY505-00-0
Name: POLYCYCLIC ORGANIC MATTER (POM)

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

Condition 14: Malfunctions and start-up/shutdown activities
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 14.1:
(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement

action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

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 and Facultative (Fac) Ponds.

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 emergency 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 closed landfill areas SLF 1-6, SLF 7, SLF-10, SLF-11, SLF-12 and RMU-1. Emissions occur from cover diffusion and barometric pumping.

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 operations that include 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-LANDF
Emission Unit Description:
Emission Unit 2-LANDF consists of landfill area RMU-2. This includes

construction and operation of the RMU-2 Landfill. Emissions occur from paved/unpaved roads, waste unloading, waste compacting, landfill cell construction, cover diffusion, barometric pumping, the active working face, and landfill capping.

Item 15.7(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.

Condition 16: Renewal deadlines for state facility permits
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 16.1:
The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 1-25: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Replaces Condition(s) 17

Item 1-25.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 1-25.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 9
270 Michigan Ave.
Buffalo, NY 14203

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 18: Visible Emissions Limited
Effective between the dates of 10/24/2014 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 18.1:
Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 1-26: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 212-2.1

Item 1-26.1:
The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000078-93-3	METHYL ETHYL KETONE
CAS No: 000108-88-3	TOLUENE
CAS No: 001330-20-7	XYLENE, M, O & P MIXT.
CAS No: 000075-09-2	DICHLOROMETHANE

Item 1-26.2:
Compliance Demonstration shall include the following monitoring:

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

Non-HTAC Emissions are Limited to less than 10 lb/hr

1.) Emissions from each Non-High Toxicity Air Contaminant (non-HTAC) shall be less than 10 pounds per hour. This applies to non-HTAC's assigned an environmental rating of B or C following the methods in 6 NYCRR Part 212-1.3 (Part 212-1.3). The applicability threshold for emission controls in Table 4 of Part 212 is 10 pounds an hour or more from a process emission source. The limit pappies to Dichloromethane (Methylene Chloride), Xylenes, Toluene, Methyl Ethyl Ketone and any non-HTAC that has actual emissions greater than 100 pounds per year.

2.) The facility must calculate and record the hourly emission rates for each non-HTAC with a moderate toxicity in DAR-1 that are reported to be present in waste management operations and other site operations. Process emissions will be compared to the 10 pound per hour threshold. The stabilization process exhausts through two emission points. The total emissions from stabilization will be summed and compared to the 10 pound per hour threshold, per 212-1.5(b).

3.) The records must be kept for at least 5 years and made available to Department staff upon request.

Parameter Monitored: DICHLOROMETHANE
Upper Permit Limit: 9.9 pounds per hour
Monitoring Frequency: Hourly when in use
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-27: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 212-2.1

Item 1-27.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 1-27.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Emission Evaluations for 6 NYCRR Part 212

This permit condition summarizes compliance methods for pollutants subject to the department's 'Process Operations' regulation, 6 NYCRR Part 212 (Part 212).

1.) High Toxicity Air Contaminants ABOVE the Maximum Emission Limit

Polychlorinated Biphenyls (PCBs) and Polycyclic Organic Matter (POMs), are defined as High Toxicity Air Contaminants (HTACs). The actual annual emissions of each are greater than the Mass Emission Limits (MEL's) in Table 2 of Part 212-2.2. Emissions of these contaminants comply with Part 212 by demonstrating that Toxic – Best Available Control Technology (T-BACT) is in place to minimize emissions. T-BACT requirements are in a separate permit condition under citation 6 NYCRR Part 212-1.5(d) in this permit.

2.) HTAC's BELOW the MEL's.
a.) HTAC's in Table 2 of Part 212-2.2 that are not identified above in item 1 will be tracked. They have actual annual emissions below the MEL's in Table 2 of Part 212-2.2.
b.) CWM calculates actual emissions of HTAC's present on a monthly basis and compares the 12-month rolling totals to the MEL's. Records must be maintained monthly.
c.) If an HTAC exceeds its MEL, then the HTAC emissions must comply with Table 4 in Part 212-2. A compliance evaluation must be conducted and submitted within 45 days.

3.) Non-HTAC ERP's GREATER than 100 pounds per year.
a.) Facility ERP estimates conclude that the following non-HTAC's exceed 100 pounds per year and must comply with Table 4 in Part

212-2.3: Xylenes, Toluene, Methylene Chloride and Methyl Ethyl Ketone.
b.) The above pollutants were assigned an Environmental Rating of B in accordance with 212-1.3.
c.) CWM will limit each B rated non-HTAC pollutant actual emissions to less than 10 pounds per hour, the applicability threshold for emission controls in Table 4 of Part 212. CWM will maintain emission rate calculation records, summarized monthly. This limit is a separate permit condition under citation 6 NYCRR Part 212-2.1.
d.) The ERP of the pollutants in item 4.a were modeled using AERMOD and comply with the Annual Guidance Concentrations and Short-term Guidance Concentrations in the DAR-1 policy, as required by Table 4 of Part 212-2.3.

4.) Non-HTAC Emission Rate Potential's (ERP's) LESS than 100 pounds a year.
a.) Facility ERP of non-HTAC's less than 100 pounds per year are considered to have a negligible impact under the DAR-1 policy, Guidelines for the Evaluation and Control of Ambient Air Contaminants under Part 212. No further review is required regarding Part 212.
b.) CWM calculates non-HTAC actual emissions on a monthly basis and compares 12-month rolling totals to the 100 pound per year threshold for contaminants with a moderate toxicity rating in DAR-1 (~282 contaminants). Records must be maintained monthly.
c.) If a non-HTAC exceeds the 100 pound per year threshold, then it must comply with table 4 in Part 212-2. A compliance evaluation must be conducted and submitted within 45 days.

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

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

Condition 19: Emission Point 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 19.1(From Mod 0):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-AQWTP

Emission Point: 00003
Height (ft.): 7 Diameter (in.): 4
NYTMN (km.): 4793.346 NYTME (km.): 176.838

Emission Point: 00004
Height (ft.): 37 Diameter (in.): 8
NYTMN (km.): 4793.351 NYTME (km.): 176.857

Emission Point: 00005
Height (ft.): 35 Diameter (in.): 12
NYTMN (km.): 4793.343 NYTME (km.): 176.819

Item 19.2(From Mod 0):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 1-STABL

Emission Point: 00001
Height (ft.): 50 Diameter (in.): 96
NYTMN (km.): 4793.58 NYTME (km.): 177.403

Emission Point: 00002
Height (ft.): 30 Diameter (in.): 52
NYTMN (km.): 4793.576 NYTME (km.): 177.391

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. The full treatment train includes neutralization/metals precipitation, filtration to remove solids, biological treatment to reduce organics, and treatment by granular activated carbon. When old landfill leachate (SLF 1-6, SLF-7, SLF-10 and SLF-11) is processed, the storage and treatment tanks and the biotowers are vented to carbon canisters. When waste acids are neutralized, the tanks may be vented to the caustic scrubber. No carbon canisters are present on the GAC or treated effluent tanks or the facultative ponds.

Emission source FLTPR includes the neutralization/metals precipitation and filtration to remove solids processes. The filter press exhausts out emission point 00003. Emission source GAC includes the biological treatment process to reduce organics, and treatment by granular activated carbon. The storage and treatment tanks in the Aqueous Waste Treatment Plant are in emission source AQTNK. The biotowers are emission source BIOTW. The biotower emissions exhaust through carbon canisters, which are emission source CARB2, and out Emission Point 00005. When waste acids are neutralized, the tanks may be vented to the caustic scrubber which is emission source SCRUB. The scrubber exhausts out Emission Point 00004. The effluent from the Aqueous Waste Treatment Plant is discharged to the facultative ponds, which are emission sources PONDS (fac pond 1/2) and FAC05 (fac pond

5).

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: FAC05 - 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 Cummins Diesel Fire-Water pump engine is rated at 187 bhp and was installed before June 2006. It is subject to 40 CFR 63 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 fugitive emissions from the closed landfills SLF 1-6, SLF-7, SLF-10, SLF-11, SLF-12 and RMU-1.

Emission Source/Control: LF1-6 - Process
Design Capacity: 64,777 square meters

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

Emission Source/Control: SLF07 - Process
Design Capacity: 32,657 square meters

Emission Source/Control: SLF10 - Process
Design Capacity: 30,836 square meters

Emission Source/Control: SLF11 - Process
Design Capacity: 101,161 square meters

Emission Source/Control: SLF12 - Process
Design Capacity: 83,572 square meters

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 for these units utilize carbon canisters 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. The standpipes do not use carbon canisters. All the leachate storage tanks are identified as emission soruce LTNK1 and the carbon canisters on the tanks are identified as emissions soure CARB1. The landfill standpipes for all these landfills are identified as emission source SPIP1.

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 two (2) stabilization tanks (emission source STBTK) and two (2) baghouses (emission source BGH01, emission point 1 and emission source BGH02, emission point 2) 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-LANDF
Process: FU2 Source Classification Code: 5-03-008-99
Process Description:
This process is the fugitive emissions from RMU-2. Emissions occur from paved/unpaved roads, waste unloading and compacting, landfill cell construction and capping, cover diffusion, barometric pumping, from the active working face and cover construction.

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

Item 20.7(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, RMU-1 and RMU-2. The leachate from these landfills have lower levels of organic emissions than the older landfill's in process LE1, as such, carbon canisters are not used on these leachate storage tanks. All the leachate tanks for these landfills are identified as emission source LTNK2. The landfill standpipes for these landfills are identified as emission source SPIP2.

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

Emission Source/Control: SPIP2 - Process

Condition 1-28: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 212-2.1

Item 1-28.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-LEACH

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

Item 1-28.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Leachate from SLF 1-6, SLF-7, SLF-10 and SLF-11
Operation and Monitoring Requirements

1.) Tanks containing hazardous waste with >500 ppm VOCs, as listed in the facility's Site-wide Part 373 Permit, are subject to 6 NYCRR 373-2.29 Air Emission Standards for Tanks, Containers and Surface Impoundments. As required by this Part 373-2.29, 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 Part 373 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 1-29: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 212-2.1

Item 1-29.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 1-LEACH

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

Item 1-29.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Leachate from SLF 1-6, SLF-7, SLF-10 and SLF-11
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 Site-wide Part 373 (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 1-30: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR 212-2.1

Item 1-30.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: 2-LANDF

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

Item 1-30.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Fugitive Dust Operational Requirements
RMU-2 and Facility Roadways

(1) The facility must employ the 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 Attachment L to the facility's Site-wide Part 373 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) Monitoring records of 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

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 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. A potently dusty load is one that could generate visible emissions during or after it is disposed. 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 (wetting waste) 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.

PM-10 will be monitored according to the Air & Meteorological Monitoring Plan, Attachment N. 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~~.*]

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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. A potently dusty load is one that could generate visible emissions during or after it is disposed. 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 (wetting waste) 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~~.

PM-10 will be monitored according to the Air & Meteorological Monitoring Plan, Attachment N. 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: June 2017

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.

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.*]

Revised: ~~7/13~~June 2017

Air & Meteorological Monitoring Plan

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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.

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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

	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.