

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 9
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June 22, 2017

Mr. Michael D. Mahar
CWM Chemical Services, LLC
1550 Balmer Road
P.O. Box 200
Model City, New York 14107

Second Notice of Incomplete Application
Air State Facility Permit Modification Request
for Proposed RMU-2
CWM Model City Facility
DEC ID 9-2934-00022/00233

Dear Mr. Mahar:

The Air State Facility Permit modification application (Application) was submitted by CWM Chemical Services, LLC (CWM) in February 2015. The Application was subsequently supplemented with Emission Inventory Reports in February 2016 and March 2016, which were then revised with the submissions dated March 24, 2017 and May 23, 2017. The application was further supplemented with the submission of an Air Quality Modeling Report on June 2, 2017 and a scanned copy of a revised Air State Facility Permit Application via electronic mail on June 7, 2017. For the reasons discussed below, the Application remains incomplete.

Specifically, the Application submitted on June 7, 2017 lists 40 CFR 63, Subpart DD (National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations) as an applicable federal requirement to the proposed RMU-2 landfill. That federal regulation, however, only pertains to Title V facilities and CWM is requesting an Air State Facility Permit. Please clarify this item and submit a revised application with original signature.

There are also several components of CWM's RMU-2 Air Quality Modeling Report, dated June 2, 2017 (Modeling Report), that are different than the information contained in the Application. Specifically, the following items need clarification and/or correction.

1. Modeling inputs in table 1A for non-high toxicity air contaminant (HTAC) compounds from the two baghouses that exhaust from the stabilization facility list emissions at nine pounds per hour for each of the two baghouses, for a total emission rate of 18 pounds per hour from the stabilization facility. The Application, as well as Section 3.1 of the Modeling Report, state that CWM



Department of
Environmental
Conservation

would limit the short-term emission rate from stabilization to 10 pounds per hour and acknowledged that going above that emission rate would subject the process to air controls pursuant to Part 212-2.3 of Title 6 of the New York Codes, Rules and Regulations (6 NYCRR). Please clarify this item and either re-run the model with the correct emission rate or advise if CWM anticipates the need for the Air State Facility Permit to incorporate additional air controls.

2. There are discrepancies between certain emissions listed in the Modeling Report and those provided in the May 23, 2017 Emissions Inventory Report. For instance, the Emission Inventory Report contains PCB concentrations that should have been used for determining PCB_1 (Aroclor 1242 and less) and PCB_2 (Aroclor greater than 1242) emission rates for each of the closed landfills. The values in Table 1A do not reflect those concentrations. Please explain how PCB_1 and PCB_2 values were calculated for all sources.
3. For the modeling files entitled "10LbPerHr," the emission rates of Xylene, Toluene, Methylene Chloride, Methyl Ethyl Ketone from "Stabilization Baghouse #1" and "Stabilization Baghouse #2" are 0.63 grams/second but the emission rates on Table 1A are 1.13 grams/second. In addition the air flow rates between the two baghouses are not identical. The emissions from the stabilization process should be allocated to each stabilization baghouse based on the proportion of air flow. Please update the modeling inputs and modeling, or explain why the method used is appropriate.
4. Please explain why the facility-wide 10 ton per year cap of hazardous air pollutants, including, Xylene, Toluene and Methylene Chloride, which is emitted from multiple sources, is modeled as only emitted from the stabilization baghouses. The gram per second emission rate for the 10 ton per year caps was not included in the modeling report. As these are inputs to the model, incorrect numbers will impact the results of the model.
5. Xylene emissions for cover diffusion and barometric pumping was included in the RMU-1 inventory but not as an input to the model. In addition, emissions from drums leaking/spilling inside a building were not included in the model. Please clarify this item and re-run the model accordingly.
6. There is a mathematical error regarding the PCB, PCB_1 and PCB_2 totals in the RMU-2 Closed Emissions portion of Table 1B. It appears that Fac Ponds

Mr. Michael D. Mahar
June 22, 2017
Page 3 of 3

- 3 and 5 were not included in the summation. Please clarify this item. As these are inputs to the model, incorrect numbers will impact the results of the model.
7. There are inconsistencies in the surface area of some of the landfills entered in the model as compared to Figure 1 and Table 2B. Please clarify this item.
 8. Please provide the basis to support the position that all emissions from Fac Pond 3 will cease by the time RMU-2 begins operations.
 9. The Modeling Report does not fully address the potential emissions from the storm water basin used to collect RMU-2 contact stormwater runoff prior to treatment. The model needs to be revised accordingly.
 10. CWM modeled the short term guidance concentration on an emission rate of eight hours per day for open emissions plus 16 hours per day for closed emissions, rather than the maximum hourly emission rate 24/7. Please remodel the short term concentration.
 11. The RMU-2 PCB_1 modeling input file used a daily cover factor of 0.01368 at 10 a.m. from Monday through Friday. This factor needs to be corrected to an open face factor which is 1.

You may contact either me at (716) 851-7165 or Michael Emery, with the Department's Division of Air Resources at (716) 851-7130, if you have any questions. Otherwise, please clarify the above and submit a revised Air State Facility Modeling Report and Application for Department staff review.

Sincerely,



Mark Passuite
Deputy Regional Permit Administrator

cc: Alfred Carlacci, P.E., NYSDEC Division of Air Resources,
Attn.: Michael Emery, P.E.
Teresa Mucha, Esq., NYSDEC Office of General Counsel
Mr. Jonathan Rizzo, CWM
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