

Permit ID: 7-3142-00028/00009

Renewal Number: 2 01/29/2021

Facility Identification Data

Name: ONONDAGA CO RESOURCE RECOVERY FACILITY

Address: 5801 ROCK CUT RD JAMESVILLE, NY 13078-9408

Owner/Firm

Name: COVANTA ONONDAGA LP Address: 5801 ROCK CUT RD JAMESVILLE, NY 13078-9408, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits: Name: ELIZABETH A TRACY Address: 615 ERIE BLVD W SYRACUSE, NY 13204-2400

Phone:3154267438

Division of Air Resources: Name: MATTHEW J POLGE Address: NYSDEC - REGION 7

615 ERIE BLVD W SYRACUSE, NY 13204 Phone:3154267485

Air Permitting Contact:

Name: COVANTA ONONDAGA LP Address: 5801 ROCK CUT RD JAMESVILLE, NY 13078-9408

Phone:

Permit Description Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

Renewal of the Air Title V permit.

Attainment Status

ONONDAGA CO RESOURCE RECOVERY FACILITY is located in the town of ONONDAGA in the county of ONONDAGA.



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The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status	
Particulate Matter (PM)	ATTAINMENT	
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT	
Sulfur Dioxide (SO2)	ATTAINMENT	
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)	
Oxides of Nitrogen (NOx)**	ATTAINMENT	
Carbon Monoxide (CO)	ATTAINMENT	

Facility Description:

The Onondaga Co. Resource Recovery Facility (OCRRF) is a 990 ton per day nominally sized waste-to-energy facility. The OCRRF consists of 3 independent mass burn combustors with waterwall tube boilers, each with a design capacity of 330 tons per day (reference waste of 6000 btu/lb). Refuse is delivered to the OCRRF in standard packer trucks and transfer vehicles for combustion. Refuse is reduced approximately 90% by volume in the combustion process. Heat energy generated in the combustion process is utilized to produce electricity in a 39.5 megawatt turbine generator. This electricity provides power to the OCRRF and the excess is sold to power reseller or broker. Auxiliary boilers firing natural gas are used during periods of startup, shutdown and at other times when the minimum combustion zone temperatures would not otherwise be met. Air pollution control includes dry scrubbers for acid gas control, fabric filters for particulate control, and a selective non-catalytic reduction (SNCR) system for NOx control and a carbon injection system for Mercury control.

^{*} Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

^{**} NOx has a separate ambient air quality standard in addition to being an ozone precursor.



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Permit Structure and Description of Operations

The Title V permit for ONONDAGA CO RESOURCE RECOVERY FACILITY

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

combustion - devices which burn fuel to generate heat, steam or power

incinerator - devices which burn waste material for disposal

control - emission control devices

process - any device or contrivance which may emit air contaminants

that is not included in the above categories.

ONONDAGA CO RESOURCE RECOVERY FACILITY is defined by the following emission unit(s):

Emission unit 1MBMWF -

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

00001, 00002, 00003

Process: MS1 is located at Building 1 - Process: MS2 is located at Building 1 -

Process: MS3 is located at Building 1 -

Process: ST1 is located at Building 1 - Process: ST2 is located at Building 1 -

Process: ST3 is located at Building 1 - One of three 330 tons per day (reference waste of 6000 Btu/lb) municipal waste combustors, firing natural gas during periods of startup, shutdown and malfunction as

these terms are described below, and as otherwise needed to meet temperature requirements.

The startup period commences when the affected facility begins the continuous burning of SW and does not include any warmup period when the affected facility is combusting only auxiliary fuel or other non-



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SW fuel and no SW is being combusted. 40 CFR 60.58(a) reads: "The standards under this subpart apply at all times except during periods of startup, shutdown or malfunction, provided however that the duration of startup, shutdown and malfunction shall not exceed three hours per occurrence." The standards regulated under this subpart, for which the regulations provide startup, shutdown or malfunction relief, are particulate matter, opacity, sulfur dioxide, hydrogen chloride, nitrogen oxides, carbon monoxide and baghouse inlet temperature. Furthermore, combustion index, as well as additional permit limits for the constituents listed above, are afforded the same relief. Combustion index is based on the carbon monoxide measurement (CI = CO2 * 100/CO2+CO) and addresses the same principal as the carbon monoxide permit limit, ie. requiring a certain combustion efficiency. The definition of malfunction relief pursuant to 40 CFR 60.58A(a) as discussed above, as well as malfunction relief for additional regulated parameters from NYSDEC on a case by case basis pursuant to 6 NYCRR Part 201-1.4 applies to the OCRRF. The definition of emergency defense pursuant to 6 NYCRR Part 201-1.5 also applies to the OCRRF. Startup, shutdown and malfunction relief would apply in those realtively few instances in which emissions limits developed for steady state operation can not be maintained due to these relatively brief transitional periods. Emergency defense would apply in rare instances in which emission limits developed for steady-state operation can not be maintained due to an emergency as defined in 6 NYCRR Part 201-2(b)(12).

The following definitions will be used to identify the mode of operation of the MWC. Warmup: natural gas is the fuel used during the warmup period at the OCRRF. The OCRRF is in the warmup stage when only auxiliary fuel is being fired in order to warm the unit up to minimum combustion zone temperatures, or to keep the unit warm, before SW feeding has commenced.

Startup: Startup is initiated at the OCRRF when a boiler's feedchute damper is opened and continuous burning of MSD is commenced. Continuous Burning: Consistent with 40 CFR 60, Subpart Ea and Cb, continuous burning is "The continuous, semi-continuous, or batch feeding of SW for purposes of waste disposal, energy production, or providing heat to the combustion system in preparation for waste disposal or energy production. The use of SW solely to provide thermal protection of the grate or hearth during the startup period shall not be considered to be continuous burning.

Shutdown: The shutdown period for a boiler begins when the continuous burning of SW is ceased and the shutdown period ends when SW is burned off the grates. The shutdown period at the OCRRF commences when the subject unit's feedchute damper is shut (this is the same time at which continuous feeding is ceased). Shutdown of a unit is complete when SW is burned off the grates. The operator verifies that the shutdown is complete by visually inspecting the grates to make sure that the fires are out.

Malfunction: 40 CFR 60.2 defines malfunction as "any sudden, infrequent and not reasonably preventable failure of air pollution control equipment or a process to operate in a normal and usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions." Malfunction is similarly defined in 6 NYCRR Part 201-2 as "any sudden and unavoidable failure of an air cleaning device or air contamination source to operate in compliance with all applicable parts of this chapter (6 NYCRR Part 201) and shall not include failures that are caused entirely or partially by poor maintenance, careless operation, or other preventable condition."

Emergency Conditions: 6 NYCRR Part 201-2(b)(12) defines emergency as "any situation arising from suddenly and reasonably unforeseeable events beyond the control of the owner and/or operator of a facility, including Acts of God, which situation requires immediate corrective action to restore normal operation and which causes the emission source to exceed a technology based requirement under the permit of State-established emission limitations, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error."



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ONONDAGA CO RESOURCE RECOVERY FACILITY is subject to Title V requirements. This determination is based on the following information:
The facility is major for HAPs, NOx, and SO2.

Program Applicability

The following chart summarizes the applicability of ONONDAGA CO RESOURCE RECOVERY FACILITY with regards to the principal air pollution regulatory programs:

Regulatory Program Applicability

PSD	YES
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.



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NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code Description

4953 REFUSE SYSTEMS

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.



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SCC Code Description

5-01-001-04

SOLID WASTE DISPOSAL - GOVERNMENT
SOLID WASTE DISPOSAL: GOVERNMENT MUNICIPAL INCINERATION
SOL WST DISPOSAL-GOV:INCINERATION:MASS BURN
REFRACTORYWALLCOMBUSTOR
5-01-900-06

SOLID WASTE DISPOSAL - GOVERNMENT AUXILIARY FUEL / NO EMISSIONS
Natural Gas

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No. 051207-31-9	Contaminant 2,3,7,8- TETRACHLORODI BENZOFURAN	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
001746-01-6	2,3,7,8- TETRACHLORODI BENZO-P- DIOXIN	0.0024			
007664-41-7	AMMONIA	128246			
007440-38-2	ARSENIC	20.4			
007440-41-7	BERYLLIUM	0.3			
007440-43-9	CADMIUM	49.8			
000630-08-0	CARBON MONOXIDE	190000			
007440-47-3	CHROMIUM	50.7			
018540-29-9	CHROMIUM(VI)	7.88			
007440-50-8	COPPER	0.012			
016984-48-8	FLUORIDE	4336			
000050-00-0	FORMALDEHYDE	0.011			
007647-01-0	HYDROGEN CHLORIDE	137707			
007439-92-1	LEAD	1001			
007439-96-5	MANGANESE	604			
007439-97-6	MERCURY	105			
007440-02-0	NICKEL METAL AND INSOLUBLE	105			



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	COMPOUNDS	
0NY210-00-0	OXIDES OF	1524240
	NITROGEN	
0NY075-00-0	PARTICULATES	135342
0NY075-00-5	PM-10	83046
001336-36-3	POLYCHLORINAT	0.313
	ED BIPHENYL	
130498-29-2	POLYCYCLIC	5.78
	AROMATIC	
	HYDROCARBONS	
007446-09-5	SULFUR	425736
	DIOXIDE	
007664-93-9	SULFURIC ACID	44413
0NY100-00-0	TOTAL HAP	160000
007440-62-2	VANADIUM	542
0NY998-00-0	VOC	72533
007440-66-6	ZINC	3732

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

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

Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)

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

Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)

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

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or



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termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)

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

Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)

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

Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)

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

Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)

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

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

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

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

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable



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requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

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

Item 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.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5



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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 02

Item B: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

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

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

Regulatory Analysis

Location	Regulation	Condition	Short Description
Facility/EU/EP/Process	/ES		



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FACILITY	ECL 19-0301	72	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.21	27, 28, 29	Prevention of Significant Deterioration
FACILITY	40CFR 52-A.21(j)(2)	30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53	Best Available Control Technology (BACT) (see narrative)
1- MBMWF/00001/MS1/00MWF	40CFR 60- Cb.33b(a)(2)(i	64	Existing Large MWC's - emission limit for cadmium
1- MBMWF/00001/MS1/00MWF	40CFR 60-Cb.33b(a)(4)	65	Existing Large MWC's - emission limit for lead
1- MBMWF/00001/MS1/00MWF	40CFR 60- Cb.33b(c)(1)(i	66	Existing Large MWC's - emission limit for dioxin/furan not utilizing an electrostatic
1- MBMWF/00001/MS1/00MWF	40CFR 60-Cb.34b(a)	67	<pre>precipitator Existing Large MWC's - operating practices carbon monoxide limit</pre>
1- MBMWF/00001/MS1/00MWF	40CFR 60-Cb.34b(b)	68, 69	Existing Large MWC's - operating practices MWC temperature requirements and unit load level
1- MBMWF/00001/MS1/00MWF	40CFR 60-Cb.35b	70, 71	Municipal waste combustor operator training and
FACILITY	40CFR 60-Cb.36b	54	certification. Emission guidelines for municipal waste combustor futitive ash emissions.
FACILITY	40CFR 60-Cb.38b	55	Compliance and performance testing.
FACILITY	40CFR 60-Cb.39b	56	Reporting and record keeping guidelines and compliance schedules.
FACILITY	40CFR 60-Cb.39b(a)	57	Reporting and Recordkeeping Requirements
FACILITY	40CFR 60-Ea.52a(b)	58	Standards for municipal waste combustor metals
FACILITY	40CFR 60-Ea.54a(d)	59	Standards for municipal waste
FACILITY	40CFR 60-Ea.56a(f)	60	combustor acid gases. Standards for municipal waste combustor operating practices
FACILITY	40CFR 60-Ea.56a(g)	61	Standards for municipal waste combustor operating practices



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FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1, 21	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10, 22	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	73	Unavoidable noncompliance and violations
FACILITY FACILITY	6NYCRR 201-1.7 6NYCRR 201-1.8	11 12	Recycling and Salvage Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 62, 63	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
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FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201- 6.4(c)(3)(ii	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	24	Compliance Schedules - Progress Reports
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FACILITY FACILITY	6NYCRR 201-6.4(f)(6) 6NYCRR 201-6.5(a)	17 74	Off Permit Changes State Enforceable Requirements
FACILITY	6NYCRR 202-1.1	18, 25	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	75	General Prohibitions - air pollution
FACILITY	6NYCRR 211.2	26	prohibited General Prohibitions - visible emissions
FACILITY	6NYCRR 215.2	9	limited. Open Fires - Prohibitions



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FACILITY FACILITY	6NYCRR 219-2.2(d 6NYCRR 219-2.2(g	•	Dioxin Emissions Municipal and Private Solid Waste Incineration Facilities -
FACILITY	6NYCRR 219-2.4(a)(1) 89, 90	Operating requirements.
FACILITY	6NYCRR 219-2.4(b) 91	Operating requirements.
1-MBMWF	6NYCRR 219-2.5	94	Start-up, shutdown and upset conditions.
1-MBMWF	6NYCRR 219-2.7	95	Continuous emission monitoring.
FACILITY	6NYCRR 219-2.7(e) 92	Continuous emission monitoring.
1- MBMWF/00001/MS1/00MWF	6NYCRR 219-7.2	96, 97	Compliance with mercury emission limitations
FACILITY	6NYCRR 251	93	CO2 Performance Standards for Major Electric Generating Facilities

Applicability Discussion:

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

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

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

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department



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representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all



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calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

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

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable



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level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, ONONDAGA CO RESOURCE RECOVERY FACILITY has been determined to be subject to the following regulations:

40 CFR 52.21

This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions;

ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i).

40 CFR 52.21 (j) (2)

BACT determinations are made on a case-by-case basis and can be no less stringent than any requirement that exists in the current State Implementation Plan (SIP) or 40 CFR 60 and 61. Emission and operational limitations required from a BACT determination will have to be entered into the **special** permit conditions, separately by the permit reviewer.

40 CFR 60.33b (a) (2) (i)

This section sets forth the emission limit for cadmium contained in the gases discharged to the atmosphere from a municipal waste combustor subject to the requirements of the Emission Guidelines, 40 CFR 60, Subpart Cb. The emission limit for cadmium is 35 micrograms per dry standard cubic meter, corrected to 7 percent oxygen.

40 CFR 60.33b (a) (4)

This section sets forth the emission limit for lead contained in the gases discharged to the atmosphere from a municipal waste combustor subject to the requirements of the Emission Guidelines, 40 CFR 60, Subpart Cb. The emission limit for lead is 400 micrograms per dry standard cubic meter, corrected to 7 percent oxygen.

40 CFR 60.33b (c) (1) (iii)

This section sets forth the emission limit for dioxins/furans contained in the gases discharged to the atmosphere from a municipal waste combustor subject to the requirements of the Emission Guidelines, 40 CFR 60, Subpart Cb which does not employ an electrostatic precipitator-based emission control system. The emission limit for dioxins/furans is 30 nanograms per dry standard cubic meter (total mass), corrected to 7 percent oxygen

40 CFR 60.34b (a)

This section sets forth emission limits for carbon monoxide, by municipal waste combustor



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technology, for carbon monoxide contained in the gases discharged to the atmosphere from a municipal waste combustor subject to the requirements of the Emission Guidelines, 40 CFR 60, Subpart Cb. Limits are established as follows: 100 parts per million by volume (ppmv) for mass burn waterwall, mass burn refractory, mass burn rotary refractory, and fluidized-bed MWCs; 250 ppmv for mass burn rotary waterwall MWCs; 50 ppmv for modular starved - air and excess air MWCs; 150 ppmv mixed fuel-fired pulverized coal/refuse derived fuel (RDF) MWCs; 200 ppmv for spreader stoker mixed fuel-fired pulverized coal/RDF and RDF stoker MWCs, all corrected to 7 percent oxygen (dry basis).

40 CFR 60.34b (b)

This section sets forth municipal waste combustor operating practices which include maximum load level and temperature requirements. The operating range for the combustor must be no more than 110 percent of the maximum load level demonstrated during the most recent performance test demonstrating compliance with the applicable dioxin/furan limit. The temperature at the inlet of the particulate matter control device must be no more than 17degrees C (30.6 F) above the maximum demonstrated particulate matter control device temperature measured during the most recent dioxin/furan performance test demonstrating compliance with the applicable dioxin/furan limit.

40 CFR 60.35b

This section requires that the applicant develop and update on a yearly basis a site-specific operating manual that must, at a minimum, address the elements of municipal waste combustor unit operation specified in 40 CFR 60.54b of Subpart Eb.

In addition, a training program is required to review the operating manual with each person who has responsibilities affecting the operation of a municipal waste combustor including, but not limited to, chief facility operators, shift supervisors, control room operators, ash handlers, maintenance personnel, and crane/load handlers.

This section also requires that each chief facility operator and shift supervisor obtain and maintain a current provisional operator certification from either the American Society of Mechanical Engineers (QRO-1-1994) or from another certification program acceptable to the Department.

40 CFR 60.36b

This section sets forth the emission limit for municipal waste combustor fugitive ash emissions. It requires that discharge to the atmosphere of visible emissions of combustion ash from the ash conveying system (including conveyor transfer points) may not exceed 5 percent of the observation period (i.e. 9 minutes per 3-hour period), as determined by EPA Reference Method 22 observations. This emission limit does not cover visible emissions discharged inside buildings or enclosures of ash conveying systems; however, it does cover visible emissions discharged to the atmosphere from buildings or enclosures of ash conveying systems. This emission limit does not apply during maintenance and repair of ash conveying systems.

40 CFR 60.38b

This section sets forth compliance and performance testing requirements for municipal waste combustors.



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40 CFR 60.39b

This section sets forth reporting and recordkeeping guidelines and compliance schedules for municipal waste combustors.

40 CFR 60.39b (a)

This section requires that the applicant meet the municipal waste combustor reporting and recordkeeping provisions listed in 40 CFR 60.59b of Subpart Eb, as applicable.

40 CFR 60.52a (b)

This section sets forth the emission limit for opacity exhibited by the gases discharged to the atmosphere from a municipal waste combustor subject to the particulate matter emission limit specified in 60.52a of 40 CFR 60, Subpart Ea. The emission limit for opacity is 10 percent (6 - minute average).

40 CFR 60.54a (d)

This section sets forth the emission limit for hydrogen chloride contained in the gases discharged to the atmosphere from a municipal waste combustor meeting the applicability requirements of 40 CFR 60, Subpart Ea. The emission limit for hydrogen chloride is 25 parts per million by volume or 5 percent of the potential hydrogen chloride emission concentration (95 - percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent.

40 CFR 60.56a (f)

This section requires that the applicant develop and update on a yearly basis a site-specific operating manual. It also specifies the minimum elements of municipal waste combustor unit operation that must be included in the operating manual.

40 CFR 60.56a (g)

This section requires that the owner or operator of a municipal waste combustor meeting the applicability requirements of 40 CFR 60, Subpart Ea, establish a training program for reviewing the operating manual annually with each person who has responsibilities affecting the operation of a municipal waste combustor including, but not limited to, chief facility operators, shift supervisors, control room operators, ash handlers, maintenance personnel, and crane/load handlers.

6 NYCRR 201-6.5 (a)

This section identifies state enforceable requirements for Title V permits.

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor



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atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 219-2.2 (d)

This section sets forth the emission limit for dioxins contained in the gases discharged to the atmosphere from a municipal solid waste incineration facility meeting the applicability criteria of 6 NYCRR Subpart 219-2.

A dioxin equivalent emission concentration in excess of 2 nanograms per dry standard cubic meter (ng/dscm), corrected to seven percent oxygen, is required.

This section also requires that any person who owns or operates a facility subject to Subpart 219-2 must submit, as part of an application for a permit to construct a new facility and for each application to renew a certificate to operate, a plan demonstrating to the satisfaction of the commissioner that all reasonable efforts and best management practices have been implemented to achieve reasonable progress toward minimization of dioxin equivalent emissions to a target value of 0.2 ng/dscm, corrected to seven percent oxygen.

6 NYCRR 219-2.2 (g)

In the absence of a contaminant specific emission limitation or ambient air quality standard, this requirement states that a permit should contain conditions to limit emissions in accordance with section 200.6 of this Title.

6 NYCRR 219-2.4 (a) (1)

This section establishes an operating requirement to monitor the combustion efficiency of an incinerator which meets the applicability criteria of Subpart 219-2.

A combustion index of 99.9 percent based on a running eight-hour average of readings, and 99.95 percent, based on a running seven-day average of readings is required. On a case-by-case basis, alternative combustion index criteria may be established for any source subject to the requirements of Subpart 219-2 which is demonstrated to be unable to meet the combustion index criteria. In no case may such alternative combustion index criteria be less than 99.80 percent, based on a running eight-hour average of readings.

6 NYCRR 219-2.4 (b)

This section establishes an operating requirement to monitor the temperature in the combustion zone of an incinerator which meets the applicability criteria of Subpart 219-2.

The section requires that an applicant demonstrate by a method specific to a proposed incinerator, and which is acceptable to the department, that actual measurements indicate a temperature and residence time of at least 1,800oF for one second in the combustion zone on a continuous basis, or equivalent. The demonstration must be based on a continuous 30 minute average of temperature measurements.



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6 NYCRR 219-2.5

This section requires that any person who owns or operates an incinerator subject to Subpart 219-2 submit, 90 days or more prior to applying for a certificate to operate, an operating plan to provide for proper maintenance, and avoid careless operation or other preventable conditions during startup, shutdown and other upset condition periods. It requires that such a plan must include provisions for equipment which automatically maintains proper operating parameters. The plan must also be found acceptable to the department and approved prior to issuance of a certificate to operate.

6 NYCRR 219-2.7

6 NYCRR 219-2.7 (e)

This section requires that any person who owns or operates an incinerator subject to Subpart 219-2, must retain for at least three years, records and summaries of all measurements and operating parameters, and make them available upon request of the department within 10 working days from receipt of the request.

6 NYCRR 219-7.2

Section 219-7.2 sets forth annual compliance requirements including stack testing procedures to demonstrate compliance with a mercury emission limitation of 28 micrograms/dscm (corrected to 7% oxygen) or 85% removal, whichever is less stringent, for each municipal waste combustor unit.

6 NYCRR Part 251

The incinerators are subject to 40 CFR Part 251, with which they are compliant. The limit is 180 lb/mmBtu.

Compliance Certification Summary of monitoring activities at ONONDAGA CO RESOURCE RECOVERY FACILITY:

Location Facility/EU/EP/Process/ES	Cond N	Type of Monitoring
FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY	27 28 29 30 31 32 33	record keeping/maintenance procedures record keeping/maintenance procedures record keeping/maintenance procedures intermittent emission testing intermittent emission testing intermittent emission testing continuous emission monitoring (cem)
FACILITY FACILITY	34 35	intermittent emission testing intermittent emission testing



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FACILITY	36	intermittent emission testing
FACILITY	37	intermittent emission testing
FACILITY	38	continuous emission monitoring (cem)
FACILITY	39	continuous emission monitoring (cem)
FACILITY	40	intermittent emission testing
FACILITY	41	intermittent emission testing
FACILITY	42	continuous emission monitoring (cem)
FACILITY	43	intermittent emission testing
FACILITY	44	continuous emission monitoring (cem)
FACILITY	45	intermittent emission testing
FACILITY	46	continuous emission monitoring (cem)
FACILITY	47	intermittent emission testing
FACILITY	48	intermittent emission testing
FACILITY	49	continuous emission monitoring (cem)
FACILITY	50	intermittent emission testing
FACILITY	51	intermittent emission testing
FACILITY	52	intermittent emission testing
FACILITY	53	intermittent emission testing
1-MBMWF/00001/MS1/00MWF	64	intermittent emission testing
	65	intermittent emission testing
1-MBMWF/00001/MS1/00MWF		<u> </u>
1-MBMWF/00001/MS1/00MWF	66	intermittent emission testing
1-MBMWF/00001/MS1/00MWF	67	continuous emission monitoring (cem)
1-MBMWF/00001/MS1/00MWF	68	monitoring of process or control device parameters as surrogate
1-MBMWF/00001/MS1/00MWF	69	monitoring of process or control device parameters
		as surrogate
1-MBMWF/00001/MS1/00MWF	71	record keeping/maintenance procedures
FACILITY	54	monitoring of process or control device parameters
		as surrogate
FACILITY	55	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	57	record keeping/maintenance procedures
FACILITY	58	monitoring of process or control device parameters
		as surrogate
FACILITY	59	intermittent emission testing
FACILITY	21	record keeping/maintenance procedures
FACILITY	22	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	continuous emission monitoring (cem)
FACILITY	7	record keeping/maintenance procedures
FACILITY	7 76	intermittent emission testing
	76 77	intermittent emission testing
FACILITY		
FACILITY	78	intermittent emission testing
FACILITY	79	intermittent emission testing
FACILITY	80	intermittent emission testing
FACILITY	81	intermittent emission testing
FACILITY	82	
		intermittent emission testing
FACILITY	83	intermittent emission testing
		intermittent emission testing intermittent emission testing
FACILITY	83	intermittent emission testing
FACILITY FACILITY	83 84	intermittent emission testing intermittent emission testing
FACILITY FACILITY FACILITY	83 84 85	intermittent emission testing intermittent emission testing intermittent emission testing
FACILITY FACILITY FACILITY FACILITY FACILITY	83 84 85 86	intermittent emission testing intermittent emission testing intermittent emission testing intermittent emission testing
FACILITY FACILITY FACILITY FACILITY	83 84 85 86 87	intermittent emission testing
FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY	83 84 85 86 87 88	intermittent emission testing
FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY	83 84 85 86 87 88	intermittent emission testing monitoring of process or control device parameters
FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY	83 84 85 86 87 88	intermittent emission testing monitoring of process or control device parameters as surrogate
FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY	83 84 85 86 87 88	intermittent emission testing monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate
FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY	83 84 85 86 87 88 89	intermittent emission testing monitoring of process or control device parameters as surrogate monitoring of process or control device parameters
FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY	83 84 85 86 87 88 89	intermittent emission testing monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate
FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY	83 84 85 86 87 88 89	intermittent emission testing monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate record keeping/maintenance procedures
FACILITY	83 84 85 86 87 88 89 90	intermittent emission testing monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate record keeping/maintenance procedures intermittent emission testing
FACILITY	83 84 85 86 87 88 89 90 91	intermittent emission testing monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate record keeping/maintenance procedures intermittent emission testing intermittent emission testing
FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY FACILITY 1-MBMWF/00001/MS1/00MWF 1-MBMWF/00001/MS1/00MWF	83 84 85 86 87 88 89 90 91 92 96 97	intermittent emission testing monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate monitoring of process or control device parameters as surrogate record keeping/maintenance procedures intermittent emission testing



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Basis for Monitoring

The facility must monitor many parameters. Intemittent stack testing is required for a variety of pollutants on an annual basis. NOx, CO, SO2 and opacity are monitored on a continuous basis.

The basis for monitoring are conditions issued in this permit. Also, federal regulations also are the basis for much of the modeling.