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April 14, 2017

Mr. Angelo Marcuccio  
New York State Department of Environmental Conservation - Region 4  
Division of Environmental Permits  
1130 North Westcott Road  
Schenectady, NY 12306-2014

Re: Request for Supplemental Information, DEC ID 4012600033, Title V Permit No. 4-0126-00033/0009  
Town of Colonie Landfill

Dear Mr. Marcuccio:

In response to the April 11, 2017 request from New York State Department of Environmental Conservation (NYSDEC), Cornerstone Engineering and Land Surveying, PLLC (Cornerstone) submits this Supplemental Information in support of the Minor Modification Application on behalf of the Town of Colonie (landfill owner and permittee) and Capital Region Landfills, Inc. (landfill operator). The Minor Modification of Title V Permit No. 4-0126-00033/0009, previously submitted on February 17, 2015, is to increase potential fugitive emissions due to the Proposed Area 7 Development (Development) of the Town of Colonie Landfill (Landfill). Also, the February 2015 application proposed that Emission Unit 1COMPO, with associated Emission Source GRIND and Process GRI, be removed from the Title V Operating Permit. This Supplemental Information proposes to add an Emission Unit 2-LCHST that consists of two (2) leachate storage tanks.

Separately, as we have discussed with Tom Chrisoffel, the Town is aware that upon renewal in 2018 of the Landfill's Title V permit, if permits are issued for the Area 7 landfill modification, NYSDEC would remove the currently applicable MSW Landfills New Source Performance Standard (NSPS) at 40 CFR Part 60, Subpart WWW, and would add conditions for NSPS, 40 CFR Part 60, Subpart XXX - MSW Landfills.

While NSPS Subpart XXX does not currently apply, it would apply to the Landfill if and when construction commences on the horizontal or vertical expansion. Assuming permits are issued for the Area 7 Development, construction is expected to commence between the Summer of 2017 and Spring of 2018, weather permitting. The Town is aware that at that time it would be required to comply with all applicable requirements of Subpart XXX, including all reporting and recordkeeping provisions.

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The Landfill's Title V Permit has an Expiration Date of October 23, 2018. A complete Renewal Application is due no earlier than 18 months (April 23, 2017) and at least 180 days (April 26, 2018) before the Expiration Date. The Town plans to include NSPS Subpart XXX as a federally enforceable applicable requirement in its Title V Renewal Application.

Attached is a USEPA TANKS that calculates the emissions from the 2 leachate storage tanks. The emissions from leachate tanks are normally not quantified because leachate is primarily water. To be conservative, emissions were calculated based on an assumption of 2% volatile organic compound (VOC) as toluene. This approach greatly over estimates the amount of VOC in leachate, but, provides a conservative estimate of the potential to emit VOC. The attached TANKS runs estimate 117.15 pounds of VOC per tank or 234.30 pounds year (0.12 tons/year) of VOC for both leachate tanks.

As requested in NYSDEC's April 11, 2017 letter, the following is a review of VOC emissions and the potential applicability of 6 NYCRR Subpart 231-5, New Major Facilities and Modifications to Existing Non-Major Facilities in Nonattainment Areas, and Attainment Areas of the State Within the Ozone Transport Region (Subpart 231-5). The project emission potential (PEP) stated above for VOCs (0.12 ton/yr) does not equal or exceed the applicable major facility threshold in tables 1 or 2 of Subpart 231-13 (i.e. 50 tons/year) (see Subpart 231-5(b)), and this PEP does not result in the facility becoming a major facility (i.e. 50 tons/year) for VOCs. Therefore, Subpart 231-5 does not apply to the facility.

Please call me at (845) 695-0221 with any questions or comments.

Sincerely,

Cornerstone Engineering and Land Surveying, PLLC

A handwritten signature in blue ink, appearing to read 'Edwin P. Valis, Jr.', is written in a cursive style.

Edwin P. Valis, Jr.  
Senior Project Manager

Attachment: USEPA TANKS Model Run Output

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cc: John H. Cunningham, Commissioner, Dept. of Public Works, Town of Colonie  
Matthew McGarry, Public Works Engineer, Town of Colonie  
Robert A. Holmes, P.E., Cornerstone Engineering  
Curt Taylor, Capital Region Landfills, Inc.  
William Clarke, Regional Permit Administrator, NYSDEC  
Richard Ostrov, Regional Attorney, Region 4  
Ricky Leone, Regional Engineer, NYSDEC  
Victoria Schmitt, Div. of Materials Management, NYSDEC  
Thomas Christoffel, Regional Air Engineer

## USEPA TANKS Model Run Output

**TANKS 4.0.9d**  
**Emissions Report - Summary Format**  
**Tank Identification and Physical Characteristics**

**Identification**

User Identification:	Colonie - Leachate Tank 1
City:	Colonie
State:	New York
Company:	Town of Colonie
Type of Tank:	Vertical Fixed Roof Tank
Description:	Colonie Landfill - Leachate Tank No. 1

**Tank Dimensions**

Shell Height (ft):	30.43
Diameter (ft):	55.95
Liquid Height (ft) :	28.43
Avg. Liquid Height (ft):	28.43
Volume (gallons):	522,877.70
Turnovers:	16.21
Net Throughput(gal/yr):	8,475,847.50
Is Tank Heated (y/n):	N

**Paint Characteristics**

Shell Color/Shade:	Gray/Medium
Shell Condition:	Good
Roof Color/Shade:	Aluminum/Specular
Roof Condition:	Good

**Roof Characteristics**

Type:	Dome
Height (ft)	2.00
Radius (ft) (Dome Roof)	55.95

**Breather Vent Settings**

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meteorological Data used in Emissions Calculations: Albany, New York (Avg Atmospheric Pressure = 14.59 psia)

**TANKS 4.0.9d**  
**Emissions Report - Summary Format**  
**Liquid Contents of Storage Tank**

**Colonie - Leachate Tank 1 - Vertical Fixed Roof Tank**  
**Colonie, New York**

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Unspecified	All	53.67	45.28	62.05	49.56	0.2702	0.2053	0.3518	92.1300			92.13	
Toluene						0.2702	0.2053	0.3518	92.1300	0.0200	0.0200	92.13	Option 2: A=6.954, B=1344.8, C=219.48



**TANKS 4.0.9d**  
**Emissions Report - Summary Format**  
**Individual Tank Emission Totals**

**Emissions Report for: Annual**

**Colonie - Leachate Tank 1 - Vertical Fixed Roof Tank**  
**Colonie, New York**

	Losses(lbs)		
Components	Working Loss	Breathing Loss	Total Emissions
Unspecified	5,024.14	833.32	5,857.46
Toluene	100.48	16.67	117.15



