



Wheelabrator Hudson Falls  
93 River Street  
Hudson Falls, NY 12839

518.747.2390 phone  
518.747.2582 fax  
www.wtienergy.com

February 27, 2020

Mr. Kevin Wood  
New York State Department of Environmental Conservation  
232 Golf Course Road  
Warrensburg, New York 12885

**RE: ANNUAL FACILITY OPERATING REPORT**

Dear Mr. Wood:

In accordance with our Operating Permit Special Condition SW-18 and 6NYCRR360, Section 3, we are pleased to submit our 2019 Annual Facility Operating Report.

If I can be of any further assistance, please do not hesitate to call me at 747-2390.

Very truly yours,

A handwritten signature in black ink that reads "Maurice C. Holcomb".

Maurice C. Holcomb  
Plant Manager

MCH/rb  
Enclosure

cc: D. Vitale - NYSDEC, Albany  
R. Brynes - WHF  
Control Room Permit Folder  
Correspondence Index  
File WASTE 3210.20191231. Annual Solid Waste Report

# COMBUSTION AND THERMAL TREATMENT FACILITY ANNUAL/QUARTERLY REPORT

**Submit the Annual Report no later than March 1, 2020.**

A. This annual/quarterly is for the year of operation from January 01, 2019 to December 31, 2019

B. Quarterly Report for:  Quarter 1  Quarter 2  Quarter 3  Quarter 4

## SECTION 1 – FACILITY INFORMATION

| FACILITY INFORMATION   |  |  |  |
|--|--|--|--|
| <b>FACILITY NAME:</b><br>Wheelabrator Hudson Falls LLC   |  |  |  |
| <b>FACILITY LOCATION ADDRESS:</b><br>93 River Street   | <b>FACILITY CITY:</b><br>Hudson Falls  | <b>STATE:</b><br>NY  | <b>ZIP CODE:</b><br>12839                    |
| <b>FACILITY TOWN:</b><br>Kingsbury   | <b>FACILITY COUNTY:</b><br>Washington  | <b>FACILITY PHONE NUMBER:</b><br>518-747-2390                                  |  |
| <b>FACILITY NYS PLANNING UNIT:</b> (A list of NYS Planning Units can be found at the end of this report). Washington County  |  |  | <b>NYSDEC REGION #:</b> 5                    |
| <b>360 PERMIT #:</b><br>5-5344-00001/00019   | <b>DATE ISSUED:</b><br>July 28, 2010   | <b>DATE EXPIRES:</b><br>July 27, 2020  | <b>NYS DEC ACTIVITY CODE:</b><br>58E01       |
| <b>FACILITY CONTACT:</b><br>Robert Brynes  | <input checked="" type="checkbox"/> public<br><input type="checkbox"/> private | <b>CONTACT PHONE NUMBER:</b><br>(518) 747-2390                                 | <b>CONTACT FAX NUMBER:</b><br>(518) 747-2582 |
| <b>CONTACT EMAIL ADDRESS:</b>  |  |  |  |
| OWNER INFORMATION  |  |  |  |
| <b>OWNER NAME:</b><br>Wheelabrator Technologies Inc.   | <b>OWNER PHONE NUMBER:</b><br>(603) 929-3000                                   | <b>OWNER FAX NUMBER:</b><br>(603) 929-7582                                     |  |
| <b>OWNER ADDRESS:</b><br>100 Arboretum Drive, Suite 310  | <b>OWNER CITY:</b><br>Portsmouth   | <b>STATE:</b><br>NH  | <b>ZIP CODE:</b><br>03801                    |
| <b>OWNER CONTACT:</b><br>Maurice Holcomb   | <b>OWNER CONTACT EMAIL ADDRESS:</b><br>mholcomb@wtienergy.com                  |  |  |
| OPERATOR INFORMATION   |  |  |  |
| <b>OPERATOR NAME:</b> <input checked="" type="checkbox"/> same as owner  |  | <input type="checkbox"/> public<br><input checked="" type="checkbox"/> private |  |
| PREFERENCES  |  |  |  |
| <b>Preferred address to receive correspondence:</b> <input checked="" type="checkbox"/> Facility location address <input type="checkbox"/> Owner address<br><input type="checkbox"/> Other (provide):  |  |  |  |
| <b>Preferred email address:</b> <input checked="" type="checkbox"/> Facility Contact <input type="checkbox"/> Owner Contact<br><input type="checkbox"/> Other (provide):   |  |  |  |
| <b>Preferred individual to receive correspondence:</b> <input checked="" type="checkbox"/> Facility Contact <input type="checkbox"/> Owner Contact<br><input type="checkbox"/> Other (provide):  |  |  |  |
| <b>Did you operate in 2019?</b> <input checked="" type="checkbox"/> Yes; Complete this form.<br><br><input type="checkbox"/> No; Complete and submit Sections 1 and 16. If you no longer plan to operate and wish to relinquish your permit/registration associated with this solid waste management activity, also complete the "Inactive Solid Waste Management Facility or Activity Notification Form" located at:<br><a href="http://www.dec.ny.gov/chemical/52706.html">http://www.dec.ny.gov/chemical/52706.html</a> . |  |  |  |

**SECTION 2 - SOLID WASTE RECEIVED/PROCESSED**

Provide the tonnages of solid waste received. DO NOT REPORT IN CUBIC YARDS!

Specify the methods used to measure the quantities received and the percentages measured by each method

100 % Scale Weight \_\_\_\_\_ % Estimated

\_\_\_\_\_ % Truck Count \_\_\_\_\_ % Other (Specify: \_\_\_\_\_)

| Type of Solid Waste   | January (tons)   | February (tons)  | March (tons)     | April (tons)     | May (tons)       | June (tons)      | July (tons)      |
|---|------------------|------------------|------------------|------------------|------------------|------------------|------------------|
| Construction & Demolition Debris                                      | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             |
| Industrial Waste (Including Industrial Process Sludges)               | 470.56           | 401.41           | 461.23           | 417.09           | 516.37           | 401.41           | 505.63           |
| Mixed Municipal Solid Waste (Residential, Institutional & Commercial) | 11,715.48        | 10,552.24        | 11,358.40        | 9,665.32         | 13,064.01        | 12,326.08        | 12,364.22        |
| Sewage Treatment Plant Sludge   | 613.13           | 535.49           | 518.15           | 622.32           | 757.36           | 571.76           | 633.29           |
| Treated Regulated Medical Waste                                       | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             |
| Emergency Authorization Waste (Storm Debris)                          | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             |
| International Waste   | 0.05             | 0.10             | 0.10             | 0.06             | 0.17             | 0.04             | 0.19             |
| Tires   | 82.88            | 93.53            | 77.80            | 35.41            | 113.48           | 84.85            | 69.15            |
| Pharmaceuticals   | 45.70            | 44.58            | 89.48            | 55.44            | 114.26           | 63.72            | 68.83            |
| <b>Total Tons Received</b>  | <b>12,927.80</b> | <b>11,627.35</b> | <b>12,505.16</b> | <b>10,795.64</b> | <b>14,565.65</b> | <b>13,447.86</b> | <b>13,641.31</b> |
| <b>Total Tons Processed</b>   | <b>11,613.87</b> | <b>11,824.54</b> | <b>14,438.85</b> | <b>9,099.05</b>  | <b>14,238.43</b> | <b>14,360.07</b> | <b>13,834.74</b> |

**SECTION 2 - SOLID WASTE RECEIVED/PROCESSED (continued)**

| Type of Solid Waste   | Tip Fee (\$/ton) | August (tons)    | September (tons) | October (tons)   | November (tons)  | December (tons)  | Total Year (tons) | Daily Avg. (tons) |
|---|------------------|------------------|------------------|------------------|------------------|------------------|-------------------|-------------------|
| Construction & Demolition Debris                                      |                  | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             | 0.00              | 0.00              |
| Industrial Waste (Including Industrial Process Sludges)               |                  | 471.53           | 448.97           | 348.25           | 430.49           | 373.60           | 5,246.54          | 14.37             |
| Mixed Municipal Solid Waste (Residential, Institutional & Commercial) |                  | 13,107.41        | 11,841.65        | 10,027.26        | 12,133.76        | 12,786.83        | 140,942.66        | 386.14            |
| Sewage Treatment Plant Sludge   |                  | 579.79           | 418.74           | 580.83           | 595.73           | 539.35           | 6,965.94          | 19.08             |
| Treated Regulated Medical Waste                                       |                  | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             | 0.00              | 0.00              |
| Emergency Authorization Waste (Storm Debris)                          |                  | 0.00             | 0.00             | 0.00             | 0.00             | 0.00             | 0.00              | 0.00              |
| International Waste   |                  | 0.22             | 0.20             | 0.10             | 0.04             | 0.16             | 1.43              | 0.004             |
| Tires   |                  | 56.68            | 66.07            | 47.72            | 9.41             | 7.46             | 744.44            | 2.04              |
| Pharmaceuticals   |                  | 53.20            | 35.53            | 114.21           | 77.24            | 34.61            | 794.80            | 2.18              |
| <b>Total Tons Received</b>  |                  | <b>14,268.83</b> | <b>12,811.16</b> | <b>11,116.37</b> | <b>13,246.67</b> | <b>13,742.01</b> | <b>154,695.81</b> | <b>423.82</b>     |
| <b>Total Tons Processed</b>   |                  | <b>13,848.40</b> | <b>13,308.57</b> | <b>11,177.55</b> | <b>12,634.72</b> | <b>13,822.25</b> | <b>154,201.04</b> | <b>422.47</b>     |

### SECTION 3 – SERVICE AREA OF SOLID WASTE RECEIVED

**Please identify where the waste is coming from.** The total tons received reported below should equal the total tons received in Section 2 (Solid Waste Received/ Processed). **DO NOT REPORT IN CUBIC YARDS!**

- If the waste **WAS** received from another solid waste management facility, please write in the name and address of the facility along with the appropriate state, county and planning unit/municipality.
- If the waste **WAS NOT** received from another solid waste management facility, please write in **"Direct Haul"** along with the appropriate state, county and planning unit/municipality where the waste was generated.

Specify transport method and percentages of total waste transported by each:

100 % Road \_\_\_\_\_ % Rail \_\_\_\_\_ % Water \_\_\_\_\_ % Other (specify): \_\_\_\_\_

Explain which waste types and service areas below are included in these transport methods \_\_\_\_\_

| SERVICE AREA OF SOLID WASTE RECEIVED                    |  |                               |                                 |  |               |
|---|--|-------------------------------|---------------------------------|--|---------------|
| TYPE OF SOLID WASTE                                     | SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR "Direct Haul" | SERVICE AREA STATE OR COUNTRY | SERVICE AREA COUNTY OR PROVINCE | SERVICE AREA NYS PLANNING UNIT<br><small>(See Attached List of NYS Planning Units)</small> | TONS RECEIVED |
| Construction & Demolition Debris                        |  |                               |                                 |  |               |
|   |  |                               |                                 |  |               |
|   |  |                               |                                 |  |               |
|   |  |                               |                                 |  |               |
|   |  |                               |                                 |  |               |
| Industrial Waste (Including Industrial Process Sludges) |  |                               |                                 |  |               |
|   |  |                               |                                 |  |               |
|   |  |                               |                                 |  |               |
|   |  |                               |                                 |  |               |
|   |  |                               |                                 |  |               |

**SERVICE AREA OF SOLID WASTE RECEIVED**

| TYPE OF SOLID WASTE | SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR "Direct Haul" | SERVICE AREA STATE OR COUNTRY | SERVICE AREA COUNTY OR PROVINCE | SERVICE AREA NYS PLANNING UNIT (See Attached List of NYS Planning Units) | TONS RECEIVED |  |
|---------------------|--|-------------------------------|---------------------------------|--|---------------|--|
| Industrial Waste    | Serenco Inc  | Canada                        | Ouebec                          | N/A  | 474.44        |  |
|                     | Nortech Environmental LLC  | Ct                            | Hartford                        | N/A  | 512.00        |  |
|                     | West Central Environmental Corp WM Env Albany Hauling  | NY                            | Albany County                   | Cyquad Region Add'l Waste Management Permit No. 02357649                 | 309.11        |  |
|                     | Taylor Garbage Service   | NY                            | Broome County                   | Broome County  | 121.55        |  |
|                     | Republic Services Inc. HEPACO LLC  | NY                            | Rensselaer County               | Cyquad Region Add'l Waste Management Permit No. 02357649                 | 1,473.61      |  |
|                     | TRIUMVIRATE ENVIRONMENTAL INC  | NY                            | Rockland County                 | Rockland County Add'l Waste Management Permit No. 02357649               | 1.43          |  |
|                     | Republic Services Inc  | NY                            | Saratoga County                 | Saratoga County  | 94.40         |  |
|                     | Waste Management of Eastern NY   | NY                            | Warren County                   | Warren County  | 190.26        |  |
|                     | Ace Carting, ESMT of New York  | NY                            | Washington County               | Washington County  | 1,635.34      |  |
|                     | Casella Waste Management   | Vt                            | Chittenden                      | N/A  | 554.40        |  |
|                     |  |                               |                                 |  |               |  |
|                     |  |                               |                                 |  |               |  |
|                     |  |                               |                                 |  |               |  |
|                     |  |                               |                                 |  |               |  |
|                     |  |                               |                                 |  |               |  |

**SERVICE AREA OF SOLID WASTE RECEIVED**

| TYPE OF SOLID WASTE | SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address)<br>OR "Direct Haul"              | SERVICE AREA STATE OR COUNTRY | SERVICE AREA COUNTY OR PROVINCE | SERVICE AREA NYS PLANNING UNIT<br>(See Attached List of NYS Planning Units) | TONS RECEIVED |
|---------------------|--|-------------------------------|---------------------------------|---|---------------|
|                     | TAM Recycling  | Ma                            | Berkshire County                | N/A   | 10.39         |
|                     | Goulet Trucking, Casella Waste Management Holyoke, Casella Waste Management Auburne                          | Ma                            | Hampden County                  | N/A   | 19,058.83     |
|                     | Goulet Trucking, Casella Waste Management Auburne  | Ma                            | Hampshire County                | N/A   | 7,162.77      |
|                     | Goulet Trucking, Casella Waste Management Auburne  | Ma                            | Worcester County                | N/A   | 13,341.55     |
|                     | Republic Services, Nathan Kellman INC, Consolidated Waste Services, Direct Haul                              | NY                            | Albany County                   | Copied from Solid Waste Management Planning Worksheet                       | 1,087.21      |
|                     | US Customs   | NY                            | Clinton County                  | Clinton County  | 0.95          |
|                     | Barbato Hillsdale Transfer Station (Goulet Trucking)   | NY                            | Columbia                        | Columbia County   | 717.76        |
|                     | Casella Waste Management, Ace Carting  | NY                            | Essex County                    | Essex County  | 1,319.12      |
|                     | Franklin County Sheriff  | NY                            | Franklin County                 | Franklin County   | 0.18          |
|                     | Waste Management of ENY Albany Hauling   | NY                            | Fulton County                   | Fulton County   | 304.52        |
|                     | Nathan H Kellman, Republic Services, Consolidated Waste Services   | NY                            | Rensselaer County               | Franklin County - L&C SWMA Inactive Member                                  | 254.74        |
|                     | Ace Carting, Casella Waste, Consolidated Waste Services, Casella Waste Management of ENY, Direct Haul        | NY                            | Saratoga County                 | Saratoga County   | 19,199.51     |
|                     | Direct Haul, Consolidated Waste Services   | NY                            | Schenectady County              | Schenectady County  | 78.98         |
|                     | Casella Waste Management - Oneonta   | NY                            | Schoharie County                | Schoharie County  | 1,013.67      |
|                     | Casella Waste, Ace Carting, Republic Services, CV Waste, IBS Waste, Waste Management of ENY, Direct Haul     | NY                            | Warren County                   | Warren County   | 32,332.65     |
|                     | Casella Waste, Waste Management of ENY, IBS Waste, CV Waste, Republic Services, Carpenter Waste, Direct Haul | NY                            | Washington County               | Washington County   | 19,443.07     |
|                     | Direct Haul  | NY                            | Wayne County                    | Wayne County  | 252.05        |
|                     | Goulet Trucking, TAM Recycling   | Vt                            | Bennington County               | N/A   | 13,859.85     |
|                     | Casella Waste Management   | Vt                            | Chittenden County               | N/A   | 862.62        |
|                     | US Customs   | Vt                            | Franklin County                 | N/A   | 0.36          |
|                     | Earth Waste and Metal, Casella Waste Management, Hubbard Brothers  | Vt                            | Rutland County                  | N/A   | 10,636.00     |
|                     | Earth Waste and Metal, Casella Waste   | Vt                            | Washington County               | N/A   | 236.33        |







**SERVICE AREA OF SOLID WASTE RECEIVED**

| TYPE OF SOLID WASTE | SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR "Direct Haul" | SERVICE AREA STATE OR COUNTRY | SERVICE AREA COUNTY OR PROVINCE | SERVICE AREA NYS PLANNING UNIT (See Attached List of NYS Planning Units) | TONS RECEIVED |
|---------------------|--|-------------------------------|---------------------------------|--|---------------|
|                     | Nathan Kelman LLC Total  |                               |                                 |  | 118.14        |
|                     | Moore Recycling Total  |                               |                                 |  | 24.64         |
|                     | New England Waste Services Total   |                               |                                 |  | 47.27         |
|                     | Town of North Elba, NYSDOT Essex County Total  |                               |                                 |  | 23.64         |
|                     | Town of North Elba, NYSDOT Essex County, Serkil LLC Total                                    |                               |                                 |  | 43.27         |
|                     | Town of North Elba, Serkil LLC Total   |                               |                                 |  | 96.15         |
|                     | County of Franklin Solid Waste Total   |                               |                                 |  | 130.66        |
|                     | County of Franklin Solid Waste management Authority Total                                    |                               |                                 |  | 15.84         |
|                     | Town of Brunswick Total  |                               |                                 |  | 40.72         |
|                     | Bonded Concrete, Upstate Dumpsters Total   |                               |                                 |  | 27.60         |
|                     | JGS Recycling, Saratoga County, Plan It Waste Recycling Total                                |                               |                                 |  | 34.73         |
|                     | JGS Recycling, Saratoga County, Total  |                               |                                 |  | 17.87         |
|                     | Nathan Kelman LLC Total  |                               |                                 |  | 73.38         |
|                     | NYS DEC Total  |                               |                                 |  | 3.90          |
|                     | CV Waste, Town of Warrensburg Total  |                               |                                 |  | 8.35          |
|                     | Earth Waste and Metal, Nathan Kelman Inc., CV Waste Removal Total                            |                               |                                 |  | 15.57         |
|                     | Waste Stream Inc Total   |                               |                                 |  | 9.58          |
|                     | Town of Castleton Total  |                               |                                 |  | 8.39          |
|                     | Earth Waste and Metals Total   |                               |                                 |  | 4.74          |
|                     |  |                               |                                 |  |               |
|                     |  |                               |                                 |  |               |
|                     |  |                               |                                 |  |               |
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|                     |  |                               |                                 |  |               |
|                     |  |                               |                                 |  |               |
|                     |  |                               |                                 |  |               |

| SERVICE AREA OF SOLID WASTE RECEIVED                                  |  |                               |                                 |  |                   |  |
|---|--|-------------------------------|---------------------------------|--|-------------------|--|
| TYPE OF SOLID WASTE   | SOLID WASTE MANAGEMENT FACILITY FROM WHICH IT WAS RECEIVED (Name & Address) OR "Direct Haul" | SERVICE AREA STATE OR COUNTRY | SERVICE AREA COUNTY OR PROVINCE | SERVICE AREA NYS PLANNING UNIT (See Attached List of NYS Planning Units) | TONS RECEIVED     |  |
| Mixed Municipal Solid Waste (Residential, Institutional & Commercial) |  |                               |                                 |  |                   |  |
| Sewage Treatment Plant Sludge   | City of Glens Falls  | NY                            | Warren County                   | Warren County  | 6,965.94          |  |
| Treated Regulated Medical Waste (TRMW)*                               |  |                               |                                 |  |                   |  |
| Emergency Authorization Waste (Storm Debris)                          |  |                               |                                 |  |                   |  |
| Other (specify)   |  |                               |                                 |  |                   |  |
| International Waste   |  |                               | Albany County                   | Capital Region Solid Waste   |                   |  |
| International Waste   |  |                               | Chemung County                  | Chemung County   |                   |  |
| International Waste   |  |                               | Schenectady County              | Schenectady County   |                   |  |
| <b>TOTAL RECEIVED (tons):</b>   |  |                               |                                 |  | <b>154,695.81</b> |  |

Part 360 Permit Limit (tpy) \_\_\_\_\_

Permit Limit based on Steaming rate (tpy) 79,000 lbs/hr stm flow

\* List generators that provide you Certificates of Treatment forms and quantities of TRMW from each \_\_\_\_\_ None

## SECTION 4 – PLANT PERFORMANCE LOG

Complete the following Annual/Quarterly Plant Performance Log:

### PLANT PERFORMANCE LOG ANNUAL/QUARTERLY SUMMARY

Processible Waste Bypassed (Tons): 154,695.81  
 Untreatable Waste Bypassed (Tons): 18.46  
 Incinerator #1 Operations (Hours): 8,299.28  
 Incinerator #2 Operations (Hours): 8,015.62  
 Incinerator #3 Operations (Hours): N/A  
 Incinerator #4 Operations (Hours): N/A  
  
 Steam Generated (Klbs): 1,016,910  
 Steam Sold (Klbs): N/A  
 Turbine Operation (Hours): 8,704.13  
 Turbine Steam Consumption (Klbs): Not Measured  
 Power Generation (MWH): 92,368.01  
 Purchased Power (MWH): 5.1  
 Annual Electricity Sold to User (MWH): 77,655.02  
  
 Ash Residue (Tons): 44,286.44  
 Volatile Matter in Ash (%): 5.3, 4.6, 4.2, 3.7  
 Ferrous Metal Recovered (Tons): 2,401.26  
 Ferrous Metal Sold (Tons): 2,401.26  
 Non-ferrous Metal Recovered (Tons): \_\_\_\_\_  
 Non-ferrous Metal Sold (Tons): \_\_\_\_\_  
 Water Consumption (Kgal): 17,605

| <u>Facility's Size</u>                                     | <u>Operations</u>          |
|--|----------------------------|
| Number of Units Installed: <u>2</u>                        | Facility is in production: |
| Nominal rated capacity of each unit: <u>70,000 kbls/hr</u> | Hours per day: <u>24</u>   |
|  | Days per week: <u>7</u>    |
|  | Days per year: <u>365</u>  |

| Hours of Downtime          | Unit #1       | Unit #2       | Unit #3 | Unit #4 | Total          |
|----------------------------|---------------|---------------|---------|---------|----------------|
| Scheduled Maintenance      | <u>374.67</u> | <u>547.17</u> | _____   | _____   | <u>921.83</u>  |
| Unscheduled Maintenance    | <u>86.05</u>  | <u>197.22</u> | _____   | _____   | <u>283.27</u>  |
| Total                      | <u>460.72</u> | <u>744.38</u> | _____   | _____   | <u>1205.10</u> |
| Availability (%) Reprinted | <u>94.74</u>  | <u>91.50</u>  | _____   | _____   |                |

## SECTION 5 – TRANSFER OR DISPOSAL DESTINATION

Identify the transfer or disposal destination of waste removed by indicating the name of the transfer or disposal facility, the type of solid waste transferred, the corresponding State/Country, the County/Province, the NYS Planning Unit of the transfer or disposal destination facility, and the amount transferred or disposed or used as alternative operating cover (AOC) at each destination. This only includes waste sent off-site for disposal, not metal recovered reported in Section 6. Refer to the list of NYS Planning Units that can be found at the end of this report. DO NOT REPORT IN CUBIC YARDS!

Transport (specify percentages):

100 % Road

\_\_\_\_\_ % Rail

\_\_\_\_\_ % Water

\_\_\_\_\_ % Other (specify: \_\_\_\_\_)

Explain which waste types and service areas below are included in these transport methods \_\_\_\_\_

| TRANSFER OR DISPOSAL DESTINATION             |   |                              |                                |   |                                       |                                       |                           |                   |  |
|--|---|------------------------------|--------------------------------|---|---------------------------------------|---------------------------------------|---------------------------|-------------------|--|
| TYPE OF SOLID WASTE                          | SOLID WASTE MANAGEMENT FACILITY TO WHICH IT WAS SENT (Name & Address) | DESTINATION STATE OR COUNTRY | DESTINATION COUNTY OR PROVINCE | DESTINATION NYS PLANNING UNIT (See Attached List of NYS Planning Units) | AMOUNT TO TRANSFER DESTINATION (TONS) | AMOUNT TO DISPOSAL DESTINATION (TONS) | AMOUNT USED AS AOC (TONS) | TOTAL YEAR (TONS) |  |
| Ash (MSW Energy Recovery)                    | Clinton County Landfill   | NY                           | Clinton County                 | Clinton County  | 5,609.42                              |                                       | 5,609.42                  | 5,609.42          |  |
|  | Wheelabrator Shrewsbury Ash Landfill                                  | Ma                           | N/A                            | N/A   | 38,677.02                             | 38,677.02                             |                           | 38,677.02         |  |
|  |   |                              |                                |   |                                       |                                       |                           |                   |  |
|  |   |                              |                                |   |                                       |                                       |                           |                   |  |
| Bypass                                       | CV Waste Removal  | NY                           | Washington Cour                | Washington Count  | 18.46                                 | 18.46                                 |                           | 18.46             |  |
|  |   |                              |                                |   |                                       |                                       |                           |                   |  |
| Emergency Authorization Waste (Storm Debris) |   |                              |                                |   |                                       |                                       |                           |                   |  |
|  |   |                              |                                |   |                                       |                                       |                           |                   |  |
| Other (specify)                              |   |                              |                                |   |                                       |                                       |                           |                   |  |
|  |   |                              |                                |   |                                       |                                       |                           |                   |  |
| <b>TOTAL SENT (tons):</b>                    |   |                              |                                |   |                                       |                                       |                           | <b>44,304.90</b>  |  |

## SECTION 6 – METAL RECOVERED

Provide the tonnages of metal recovered from the mixed solid waste stream. Identify the location or solid waste management facility to which the recovered metal was sent from your facility, by indicating the name of the facility, the type of metal recovered, the corresponding State/Country, the County/Province, the NYS Planning Unit, and the amount recovered. Refer to the list of NYS Planning Units that can be found at the end of this report. **DO NOT REPORT IN CUBIC YARDS!**

Transport (specify percentages):

100 % Road \_\_\_\_\_ % Rail \_\_\_\_\_

\_\_\_\_\_ % Water \_\_\_\_\_ % Other (specify: \_\_\_\_\_)

Explain which waste types and service areas are in these transport methods \_\_\_\_\_

| METAL RECOVERED FOR REUSE/RECYCLING  |   |                                    |                                      |   |   |  |
|--------------------------------------|---|------------------------------------|--------------------------------------|---|---|--|
| METAL RECOVERED                      | DESTINATION<br>(Name & Address)                                   | DESTINATION<br>STATE OR<br>COUNTRY | DESTINATION<br>COUNTY OR<br>PROVINCE | DESTINATION<br>NYS PLANNING<br>UNIT<br><small>(See Attached List of<br/>NYS Planning Units)</small> | TONS<br>RECOVERED<br><small>(out of facility)</small> |  |
|                                      | Upstate Shredding 1 Recycle Drive, Owego, NY 13827                | NY                                 | Otsego County                        | Otsego County   | 2344.78   |  |
| <b>Ferrous Metal</b>                 |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
| <b>Non-ferrous Metal</b>             |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
| <b>Other Metal (specify)</b>         |   |                                    |                                      |   |   |  |
| Scrap Metal                          | R. Cohen Recycling Inc. 38 Gear Street Glens Falls, NY 12801-3836 | NY                                 | Warren County                        | Warren County   | 56.48   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
|                                      |   |                                    |                                      |   |   |  |
| <b>TOTAL METAL RECOVERED (tons):</b> |   |                                    |                                      |   | <b>2,401.26</b>                                       |  |

## SECTION 7 - FIRE AND SAFETY INCIDENTS

Provide a summary of the time, date, and details of any incidents which required the implementation of the contingency plan.

None to report.

## SECTION 8 - BUDGET

Provide an annual income and expense statement providing details on the major accounting items and operating and maintenance costs.

## SECTION 9 - INSPECTIONS

Provide a copy of the annual facility inspection report conducted and stamped by a professional engineer licensed to practice in New York State.

See attachment 1

## SECTION 10 - GOALS

Provide a narrative of the goals and objectives to be attained in the next future calendar year and any major repairs or renovations proposed.

Facility will replace the 1st precipitator field on unit #2.

**SECTION 11 – UNAUTHORIZED SOLID WASTE**

Has unauthorized solid waste been received at the facility during the reporting period?

Yes  No If yes, give information below for each incident (attach additional sheets if necessary):

| Date Received | Type Received | Date Disposed | Disposal Method & Location |
|---------------|---------------|---------------|----------------------------|
|               |               |               |                            |
|               |               |               |                            |
|               |               |               |                            |
|               |               |               |                            |

**Radiation Monitoring**

Does your facility use a fixed radiation monitor?  Yes  No  
 Identify Manufacturer Ludlum and Model 44-8 of fixed unit.

Does your facility use a portable radiation monitor?  Yes  No  
 Identify Manufacturer Ludlum and Model #3 of fixed unit.

If the radiation monitors been triggered give information below for each incident:

| Incident Number | Received |       | Hauler           | Origin      | Truck Number | Reading  | Disposal Status                    | Removed |       |
|-----------------|----------|-------|------------------|-------------|--------------|----------|------------------------------------|---------|-------|
|                 | Date     | Time  |                  |             |              |          |                                    | Date    | Time  |
| 2019-01         | 5/24/19  | 10:30 | Hubbard Brothers | Rutland, Vt | 42C80 Vt     | 5 mRem   | Return To Rutland Transfer Station | 5/25/19 | 11:00 |
| 2019-02         | 9/6/19   | 06:10 | Casella Waste    | Auburn, Ma  | 62533 Ma     | 0.3 mRem | Return To Auburn Transfer Station  | 9/6/19  | 15:00 |
|                 |          |       |                  |             |              |          |                                    |         |       |
|                 |          |       |                  |             |              |          |                                    |         |       |



## SECTION 12 - COST ESTIMATES AND FINANCIAL ASSURANCE DOCUMENTS

Are there required cost estimates and financial assurance documents for closure?

- Yes    No   If yes, attach additional sheets reflecting annual adjustments for inflation and any changes to the Closure Plan?

## SECTION 13 – PROBLEMS

Were any problems encountered during the reporting period (e.g., specific occurrences which have led to changes in facility procedures)?

- Yes    No   If yes, attach additional sheets identifying each problem and the methods for resolution of the problem.

## SECTION 14 – CHANGES

Were there any changes from approved reports, plans, specifications, and permit conditions?

- Yes    No   If yes, attach additional sheets identifying changes with a justification for each change.

## SECTION 15 - PERMIT/CONSENT ORDER REPORTING REQUIREMENTS

Are there any additional permit/consent order reporting requirements not covered by the previous sections of this form?

- Yes    No   If yes, attach additional sheets identifying the reporting requirements with their respective responses.

## SECTION 16 - SIGNATURE AND DATE BY OWNER OR OPERATOR

Owner or Operator must sign, date and submit one completed form to the appropriate Regional Office (See attachment for Regional Office addresses, email addresses and Materials Management Contacts.)

The Owner or Operator must also submit one copy by email, fax or mail to:

New York State Department of Environmental Conservation  
Division of Materials Management  
Bureau of Solid Waste Management  
625 Broadway  
Albany, New York 12233-7260  
Fax 518-402-9041  
Email address: SWMFannualreport@dec.ny.gov

I certify, under penalty of law, that the data and other information identified in this report have been prepared under my direction and supervision in compliance with a system designed to ensure that qualified personnel properly and accurately gather and evaluate this information. I am aware that any false statement I make in such report is punishable pursuant to section 71-2703(2) of the Environmental Conservation Law and section 210.45 of the Penal Law.

Maurice C. Holcomb  
Signature

2/28/2020  
Date

Maurice C. Holcomb  
Name (Print or Type)

General Manager  
Title (Print or Type)

mholcomb@wtienergy.com  
Email (Print or Type)

93 River Street  
Address

Hudson Falls  
City

New York 12839  
State and Zip

518 747 2390  
Phone Number

ATTACHMENTS:  YES  NO  
(Please check appropriate line)

January 20, 2020

Mr. Robert Brynes, Environmental Health & Safety Manager  
Wheelabrator Hudson Falls, LLC  
93 River Street  
Hudson Falls, New York 12839-0191

**Re: *Wheelabrator Hudson Falls LLC  
2019 Annual Professional Engineer Inspection  
Holt File 19-218.28***

Dear Mr. Brynes:

I have completed inspection of the Wheelabrator Hudson Falls, LLC facilities, have reviewed 2019 annual performance records, and submit this summary of my inspection and review as my annual Professional Engineer's inspection findings of the Wheelabrator Hudson Falls, LLC facilities in Hudson Falls. This Report may be included in your Annual Facility Report to the New York State Department of Environmental Conservation.

The New York State Department of Environmental Conservation (NYSDEC) Division of Solid Waste requests, in paragraph 360-3.3 (h){6} of 6 NYCRR Part 360, that:

“At least annually, a general facility inspection must be undertaken to determine the operating condition of health, safety, emergency, security, process and control equipment. This annual inspection must be performed under the direction of an individual licensed to practice engineering in the State of New York. This individual must prepare a summary report of the inspection which must be submitted to the Department's central office and the office of the Department administering the region within which the facility is located, as part of the annual facility report.”

The required inspections were conducted by the undersigned, a registered Professional Engineer licensed to practice engineering in the State of New York, accompanied by Mr. Robert Brynes, Environmental Health & Safety Manager, Wheelabrator Hudson Falls LLC.

The Findings and Conclusion stated below are based on walk-through inspection of the facility and interview with you performed on November 25, 2019, and a review of various reports and related documentation which are generated by the facility.

## **Goals**

The goals of the inspection include the following:

1. Assess whether the equipment installed is functioning properly such that it is processing solid waste and residue in accordance with the facility's permit.
2. Detect, and provide recommendations to correct, any equipment or facility malfunctions that may lead to a condition of permit "non-compliance."
3. Detect, and provide recommendations to correct, any problems that impact upon worker safety, the environment, and/or public health.
4. Provide recommendations to improve facility equipment availability if it is below 85%.
5. Determine if the facility is operating in conformance with approved plans and manuals.
6. Determine if the facility's approved plans and manuals are available for use by the facility operating staff to aid in the execution of their job duties, and if not, provide recommendations for making documents available to staff.

## **Findings**

### ***Goal 1.***

The completed facility inspections and review of performance records indicated that the installed equipment is processing solid waste and residue in accordance with current NYSDEC permit No. 5-5344-00001/00019, which was renewed on July 28, 2010, with the permit period running until July 27, 2020. This permit is for two (2) Waste-to-Energy units for incineration of Municipal Solid Waste used to generate electricity as per Article 27, Title 7, 6NYCRR 360: Solid Waste Management. The facility received a modification to this permit approving operations to include the processing of Treated Regulated Medical Waste (TRMW) in February, 2013, and a modification to allow the processing and burning of Bio-Solids in 2015.

The facility has been granted a separate Title V permit for Air Pollution Control, permit No. 5-5344-0001/00016, renewed November 27, 2019, with the permit period running until November 26, 2024. With respect to allowable throughput, the steam capacity and refuse charging rate are variable over the refuse heat content range as described in Section F of the permit application.

The facility SPDES permit was renewed in 2016. The facility Chemical Bulk Storage tank registration (CBS #5-000099) was renewed in 2016.

Facility maintenance and improvements have included:

- Unit #1
  - Replaced – 1<sup>st</sup> & 2<sup>nd</sup> section grate & carriage assemblies
  - Replaced – 70 superheater tubes
  - Replaced – 1<sup>st</sup> precipitator field
  - UT inspections of lower furnace wall, weak areas weld reinforced
  
- Boiler #2
  - Replaced – vertical water walls, inboard/outboard, 10 ft. – 27 ft.
  - Replaced – horiz. water walls, outboard, above 2<sup>nd</sup> grate section
  - Replaced – 80 superheater tubes
  - UT inspections of lower furnace wall, weak areas weld reinforced
  
- #1 facility air compressor overhauled/rebuilt

With respect to ash residue, due to the significantly low and non-hazardous characteristics identified in the residue ash, this facility has been granted several beneficial modifications in its Ash Sampling and Analysis Plan reflecting an efficient and well-run facility. The facility processed 154,201 tons of waste. The facility processed and shipped 44,283 tons of ash during 2019, with 2,853 tons of ferrous metal recovered. Ash characterization analysis indicates continued compliance with Permit requirements based on sampling and laboratory testing for the April and October 2019 test periods. Ash continues to be utilized as alternative daily landfill cover material (ACM) under a Beneficial Use Permit, and ash was routinely shipped to the Shrewsbury Landfill in Shrewsbury, MA, in 2019.

## ***Goal 2.***

Scheduled occurrences of boiler down-time were experienced during 2019 for replacement of boiler super heater and refractory, with additional limited periods of down-time required for maintenance throughout the year.

The facility continues to file all required reports to both the Air Resources and Solid Waste Divisions in a timely manner. No other issues relating to equipment or facility malfunctions that could lead to a condition of permit “non-compliance” were noted during the facility inspection.

***Goal 3.***

No outstanding problems that impact worker safety, the environment, and/or public health were detected. The facility continues certification with Star status under OSHA's Voluntary Protection Program and actively supports the management and continued success of the Program. The facility follows regular and routine procedures of recognizing, reporting, and responding to conditions relating to environmental, health & safety concerns. There were no worker injury incidents reported in 2019.

***Goal 4.***

The overall facility availability has been in excess of 85% from 1993 through 2018, with minor exception in 2001 when the operational capacity was very slightly below that (at 84.8%) due to boiler tube replacement operations. The 2019 operational availability has been reported at 94.74% (Unit #1) and 91.50% (Unit #2), with variable monthly availability including lower availability during routine scheduled periods of maintenance and repairs. Turbine availability was reported as 99.36%, with 92,368 MW electric power produced. No recommendations to improve facility availability beyond planned major maintenance and repairs have been identified and none are noted here.

***Goal 5.***

The facility is operating in conformance with the approved plans and manuals referenced by the current Part 360 and Title V permits. Procedures call for the Operations and Maintenance (O&M) Manuals to be reviewed and updated annually by management.

Facility compliance inspections and review with regard to Title V air emissions, Part 360 Solid Waste Management operations, Chemical Bulk Storage, and SPDES compliance was performed by NYSDEC staff in 2019. USDA performed inspection regarding Regulated International Disposal requirements. These inspections found the facility to be operating in compliance with applicable permit conditions and no violations were noted during the inspection.

There were four instances of radiation detected by the radiation monitoring equipment installed at the facility truck scale. In each instance, the suspect load was evaluated as per the Radiation Protocol approved by NYSDEC and the load was returned to the generator.

**Goal 6.**

The approved plans and manuals for the facility are readily available for use by the facility operating staff to aid in the execution of their job duties. Several copies of the complete documents are available and placed within the facility such that access is easily obtained, including both management office areas and operating control room areas.

In addition, individual employees review the manuals on an annual basis, with special attention directed to any changes or modifications. The facility O&M manuals were revised to reflect the updated boiler control systems and updated and revised staffing plans.

**Conclusion**

Based upon my observations during the annual general facility inspection on November 25, 2019, and review of available documentation covering the 2019 period, I have concluded that the facilities of Wheelabrator Hudson Falls, LLC, at 93 River Street, Hudson Falls, NY are being operated in compliance with NYSDEC Permit to Operate Number 5-5344-00001/00019.

If you have any questions regarding my inspection or this Summary Report, please do not hesitate to call me at (518) 784-9021.



Very truly yours,  
Holt Consulting

A handwritten signature in black ink, appearing to read "Jeffrey R. Holt".

Jeffrey R. Holt, P.E.  
NYSPE No 057039