



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive  
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

Re: Permit to Install  
Stark County  
Application No: 15-1244  
NSPS  
TOXIC REVIEW

CERTIFIED MAIL

December 24, 1996

AMERICAN LANDFILL, INC.  
RICHARD CUNNINGHAM  
ONE AMERICAN WAY  
WARREN, OH 44484

DEC 30 1996

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations & Permit Section  
Division of Air Pollution Control

cc: US EPA  
CANTON AIR POLLUTION CONTROL

George V. Voinovich, Governor  
Nancy P. Hollister, Lt. Governor  
Donald R. Schregardus, Director



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## Permit to Install Terms and Conditions

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Application No. 15-1244  
APS Premise No. 1576181541  
Permit Fee: \$1600.00

Name of Facility: AMERICAN LANDFILL, INC.

Person to Contact: RICHARD CUNNINGHAM

Address: ONE AMERICAN WAY  
WARREN, OH 44484

Location of proposed source(s): 7916 CHAPEL STREET, S.E.  
SANDY TWP, OHIO

Description of proposed source(s):  
MSW LANDFILL FLARE.

Date of Issuance: December 24, 1996

Effective Date: December 24, 1996

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

**CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

#### PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

#### SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for AMERICAN LANDFILL, INC. located in Stark County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P001	Landfill gas extraction system and open utility flare for the existing MSW landfill	Compliance with 40 CFR Part 60 Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills, as indicated, including the use of a well-designed and well operated gas collection system, use of open candle type utility flare to reduce the NMOC in the collected gas by 98 weight percent, and see the Additional Special Terms and Conditions.	3745-31-05 Best Available Technology (BAT)	50.01 lbs CO/hr 219.03 TPY CO 9.18 lbs NO <sub>x</sub> /hr 40.21 TPY NO <sub>x</sub> 0.92 lb SO <sub>2</sub> /hr 4.02 TPY SO <sub>2</sub> 4.77 lbs HCL/hr 20.91 TPY HCL 18.90 lbs CH <sub>4</sub> /hr 82.78 TPY CH <sub>4</sub> 0.04 TPY H <sub>2</sub> S 0.02 TPY Benzene 0.37 TPY Toluene 0.03 TPY Vinyl Chloride 0.14 TPY Dichloro-difluoromethane 0.02 TPY Chlorobenzene 0.11 TPY Methylene Chloride 0.05 TPY 1,2 Dichloroethane 0.07 TPY Carbon Tetrachloride 0.10 TPY Tetrachloroethane 0.03 TPY

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				1,1 Dichloroethane 0.01 TPY 1,1,2,2-Tetrachloroethane 0.01 Chloromethane 0.02 Chlorodifluoromethane
				98% by weight Reduction efficiency of NMOC
			40 CFR Part 60 Subpart WWW (NSPS WWW)	Monitor surface concentrations of methane as per Section 60.756 paragraph (f)
				See the Additional Special Terms and Conditions
			40 CFR Part 60.18	Operate and monitor the open flare as specified

**SUMMARY**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
CO	219.03
NO <sub>x</sub>	40.21
SO <sub>2</sub>	4.02
HCL	20.91
CH <sub>4</sub>	82.78
H <sub>2</sub> S	0.04
NMOC*	0.98
Benzene	0.02
Toluene	0.37

**SUMMARY**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
Vinyl Chloride	0.03
Dichlorodifluoromethane	0.14
Chlorobenzene	0.02
Methylene Chloride	0.11
1,2 Dichloroethane	0.05
Carbon Tetrachloride	0.07
Tetrachloroethane	0.10
1,1 Dichloroethane	0.03
1,1,2,2 Tetrachloroethane	0.01
Chloromethane	0.01
Chlorodifluoromethane	0.02

\*NMOC is the sum of all the pollutants beneath NMOC in this table.

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Canton Air Pollution Control, 420 Market Ave. N. , City Hall, Canton, Ohio 44702-1544.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

**AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**NINETY DAY OPERATING PERIOD**

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. Operational Restrictions**

1. The collected gas shall be routed to a flare control system designed and operated to reduce NMOCs by 98 weight-percent, at maximum inlet concentration, unless the collected gas is routed to the treatment system that processes the collected gas for subsequent sale. The flare shall be operated with a flame at all times waste gas is being vented to it.
2. All landfill gas collected shall be directed to the flare station or to the treatment system that processes the collected gas for subsequent sale or use.
3. Whenever the flare is in operation, a temperature needed to ensure 98 weight-percent destruction of the NMOCs must be maintained and at least 530 SCFM of landfill gas must be fed to it.
4. This facility shall be limited to inputting to the flare less than or equal to 5,000 scf of landfill gas per minute and 2,628 million scf of landfill gas per year.
5. This facility shall operate the collection and control systems in accord with 40 CFR Part 60 Subpart WWW, Section 60.753.

**B. Monitoring and/or Recordkeeping Requirements**

1. This facility shall monitor the operations in accord with the Standards of Performance for Municipal Solid Waste Landfills (Standards), Section 60.756 as indicated in this Additional Special Term and Condition. The following operations shall be monitored:
  - a. for the active collection system, monitor as per paragraph (a) and following;

- b. for the open flare, monitor as per paragraph (c), (c)(1), (c)(2), and (c)(2)(i). Also, the flare shall be monitored as per 40 CFR Part 60.18(d); and
  - c. for the surface methane operational standard, monitor as per paragraph (f).
2. The flare shall be monitored to ensure that it is operated and maintained in conformance with its design.
  3. This facility shall operate and maintain a heat sensing device (an ultraviolet beam sensor) and associated controller at the pilot light to indicate the continuous presence of a flame. The ultraviolet beam sensor shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

If the ultraviolet beam sensor detects a no flame condition and the flame cannot be immediately restarted, the system shall automatically shut down the flow of landfill gas to the flare.

4. This facility shall maintain monthly records of the amount of landfill gas, in scf, input to the flare, the amount of landfill gas, in scf, input to the treatment system that processes the gas for subsequent sale or use, and the number of hours that the flare was operated.
5. This facility shall maintain monthly records of any malfunctions when unburnt landfill gas was released from the flare.
6. The records required under the preceding two paragraphs shall be maintained in a bound logbook at the facility for a period of five years and shall be available for review by the Administrator, the Director, or their representative during normal business hours at the facility.
7. This facility shall maintain records in accord with the Standards of Performance for Municipal Solid Waste Landfills, Section 60.758, as follows:
  - a. the records required in paragraph (a), maximum design capacity, the current amount of solid waste in place, and the year by year waste acceptance rate, shall be maintained as indicated in this section except that the records must be maintained on the facility premises;
  - b. the control equipment records as per paragraph (b) and paragraphs (b)(1) and (b)(4);

- c. the equipment operating parameters records as per paragraph (c), (c)(2), and (c)(4);
- d. the collector records as per paragraph (d), (d)(1), and (d)(2); and
- e. the collection and control systems exceedance records required in paragraph (e).

**C. Reporting Requirements**

1. Any breakdown or malfunction of the landfill gas flare and/or the gas treatment system resulting in the emission of raw landfill gas to the atmosphere shall be reported to the Canton City Health Department, Air Pollution Control Division as indicated in Ohio Administrative Code 3745-15-06.
2. An annual gas flow report is to be submitted by this facility to the Canton City Health Department, Air Pollution Control Division. This report shall contain the amount of landfill gas input to the flare and diverted to the treatment system. This report shall be submitted By February 1 of each year and shall address the data obtained during the previous year.
3. Pursuant to the NSPS, the owner or operator shall furnish written notifications as per Section 60.7 paragraphs (a)(1), (2), (3), and (4) at the appropriate times. The written notification shall be sent to:

Ohio EPA, Division of Air Pollution Control  
Permit Management Unit  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and

Canton City Health Department  
Air Pollution Control Division  
420 Market Avenue North  
Canton, Ohio 44702

4. This facility shall submit reports in accord with the Standards of Performance for Municipal Solid Waste Landfills, Section 60.757, as indicated in this Additional Special Term and Condition. The original report shall be submitted to:

U.S. Environmental Protection Agency  
Director, Air Management Division  
230 South Dearborn Street  
Chicago, Illinois 60604

and copies to:

Ohio EPA  
Division of Air Pollution Control  
Permit Management Unit  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and

Division of Air Pollution Control  
Canton City Health Dept.  
420 Market Avenue, N.  
Canton, Ohio 44702-1544

- a. the initial design capacity report required by paragraph (a) shall be submitted within ninety (90) days of issuance of this Permit to Install, if not already submitted, and shall contain the items required by paragraph (2)(i) and (2)(ii).
- b. an amended design capacity report required by paragraph (a)(3) shall be submitted, if necessary;
- c. the initial NMOC emission rate report required by paragraph (b) shall be submitted within ninety (90) days of issuance of this Permit to Install if not already submitted;
- d. this facility is not subject to submitting the collection and control system design plan in 60.752(b)(2)(i) and in 60.757(c) except that this facility shall submit a report certifying that the collection and control system either conforms with the specifications for active collection systems in Section 60.759 or include a demonstration to the Administrator's satisfaction of the sufficiency of the alternative provisions to Section 60.759 at the time that the completion certification for this Permit to Install is submitted;
- e. this facility shall submit a closure report required by paragraph (d) within thirty (30) days of waste acceptance cessation;
- f. this facility shall submit an equipment removal report required by paragraph (e) thirty (30) days prior to removal or cessation of operation of the control equipment;

- g. this facility shall submit annual reports in accord with 40 CFR Part 60.757(f), including paragraphs (f)(1) through (f)(6). This annual report is to document the performance of the active collection system as required in 60.752(b)(2)(ii)(A); and
- h. this facility shall submit the information required in Section 60.757 (g)(1) through (6) with the initial test report required under Section 60.8.

**D. Compliance Methods and Testing Requirements**

- 1. Compliance with the emission limitations in this Additional Special Term and Condition shall be determined in accordance with the following method(s):

COMPLIANCE TABLE

<u>Emission Limitations</u>	<u>Applicable Compliance Method</u>
Methane concentration less than 500 PPM above background at the surface of the landfill.	Follow the method in 40 CFR Part 60.755 (c) and (d)

- 2. This facility shall meet the compliance provisions in accord with the Standards of Performance for Municipal Solid Waste Landfills, Section 60.755.
- 3. The permittee shall conduct emission testing for the methane concentration emission limit at the frequency specified in 40 CFR Part 60.755 (c) and (d). The test methods which must be employed to demonstrate compliance with the concentration emission limitation for Methane are specified in 40 CFR Part 60.755 (c) and (d).

**E. Miscellaneous**

- 1. Flare Requirements
  - a. There shall be no visible emissions, as determined by Method 22 observations, except for periods of time not to exceed a total of 5 minutes during any 2 consecutive hours.
  - b. The utility flare shall be designed, installed, and operated in accord with the Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 60.750 to 60.759 as indicated in these Additional Special Terms and Conditions, in accord with 40 CFR 60.18 (b) to (f), and in accord with the PTI application.

2. Gas Collection System Requirements

- a. Design, construction, and siting of the gas extraction wells and collection system shall be in accordance with the PTI application, the Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 60.750 to 60.759 as indicated in these Additional Special Terms and Conditions, and with standard industry methods and practices currently in use.

3. Other Requirements

- a. This facility shall meet the Standards for Air Emissions from municipal solid waste landfills in accord with the Standards of Performance for Municipal Solid Waste Landfills, Section 60.752, as clarified, as follows:
  - i. paragraphs (b) (2), and (b) (2) (iii) (A) or (b) (2) (iii) (C), and (b) (2) (iv); and
  - ii. paragraph (b) except that:
    - A. the owner or operator of the MSW landfill must meet paragraph (b) (2) and not (b) (1);
    - B. the owner or operator of the MSW landfill is not subject to the requirement to submit a collection and control system design plan detailed in paragraph (b) (2) (i); and
    - C. the owner or operator of the MSW landfill shall install an active collection and control system per paragraphs (b) (2) (ii) and (b) (2) (ii) (A) except that the active collection and control system shall be installed prior to the submission of the Construction Compliance Certification required by this PTI.
- b. The equipment associated with this emissions unit shall be operated and maintained by personnel properly trained in its operation.
- c. Any section of landfill material exposed during construction shall be covered as soon as possible once construction of that section is complete.
- d. During construction, all working areas, construction spoils and unpaved roadways associated with this emissions unit shall be watered down to minimize dust.

- e. The permit holder shall operate this facility in such a manner that it does not become offensive or objectionable to the public in violation of OAC Rule 3745-15-07. If such an odor is detected at the property line, the permit holder and operator shall institute all available mitigation measures. Odor mitigation measures deemed appropriate by the Director to protect the comfort, repose, health or safety of the public shall be implemented by the permit holder upon the written request of the City of Canton Health Department, Air Pollution Control Division.
- f. This facility shall not cause or allow any open burning at this location.
- g. The owner or operator of this facility shall not install any air contaminant source other than those named in this Permit to Install, including a landfill gas fired boiler or generator, without first obtaining a Permit to Install from the Ohio EPA.

H. Authority to Enter

Pursuant to the authority in OAC rule 3745-77-07(C)(2) or ORC section 3704.03(L), any representative of the Director may, upon presentation of proper identification, enter at any reasonable time upon any portion of the property where this landfill is located, including any improvements thereon, to make inspections, take samples, conduct tests and examine records or reports pertaining to any emissions of air contaminants and any monitoring equipment, emissions control equipment or methods. No operator or agent of this landfill shall act in any manner to refuse, hinder, or thwart this legal right of entry.