



State of Ohio Environmental Protection Agency

COPY

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
STARK COUNTY
Application No: 15-01391**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
Asbestos	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 2/6/01

Countywide RDF
Tim Vandersall
3619 Gracemont Avenue
East Sparta, OH 44626

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 Review Appeals Commission 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 within thirty (30) days after the 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 Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

RECEIVED

FEB 07 2001

**CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION**

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

Canton LAA



Permit To Install
Terms and Conditions

Issue Date: February 6, 2001
Effective Date: February 6, 2001

FINAL PERMIT TO INSTALL 15-01391

Application Number: 15-01391

APS Premise Number: 1576001579

Permit Fee: \$1200

Name of Facility: Countywide RDF

Person to Contact: Tim Vandersall

Address: 3619 Gracemont Avenue
East Sparta, OH 44626

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3619 Gracemont Avenue
East Sparta, Ohio**

Description of proposed emissions unit(s):

**Modification of the current PTI, 15-00679, issued August 6, 1991 for emissions unit F002, Landfill Operations, for the addition of the disposal of Regulated Asbestos Containing Material (RACM).
Modification of the current PTI, 15-00679, issued August 6, 1991 for emissions unit F001, Roadways, to allow increased PM emissions due to increased vehicle traffic levels.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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

October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition

depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the

emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. **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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

6. Construction of New Sources(s)

The proposed emissions unit(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 emissions unit(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 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.

7. 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.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	96.4
CO	161
NOx	28.5
SO2	2.30
HCl	11.1
NMOC	4.80

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. This facility shall not cause or allow any open burning on this facility in violation of OAC chapter 3745-19.
2. This facility is located in Pike Township of Stark County, Ohio, which is not one of the listed Appendix A areas designated in OAC rule 3745-17-08. Therefore, the requirements of OAC rule 3745-17-07 and 3745-17-08 do not apply to roadways and parking lots and non-RACM material handling unless at such time, pursuant to OAC rule 3745-17-08 (A)(2), in the Director's judgment, probable cause exists to believe that an emissions unit is causing or contributing to a violation of OAC rule 3745-15-07 or 3745-17-02.
3. 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.
4. The permittee shall not initiate or allow any salvage operations to be conducted at this location without prior written approval of the Ohio EPA.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001: Paved (Entrance Road) and unpaved roadways (Haul Roads) and parking areas (Fugitive Emissions)	OAC rule 3745-31-05 (A)(3)	Particulate emissions shall not exceed 89.6 tons/yr.
Modification of PTI 15-679 issued August 21, 1991 to increase the allowable from 15.5 TPY PM Emissions to 89.6 TPY PM Emissions (increase due to increased vehicle traffic levels) and other changes. This PTI supersedes PTI 15-679.		For paved roadways, there shall be no visible particulate emissions except for one minute during any 60-minute period.
PTI 15-679 issued August 21, 1991, was a modification of previously issued PTI 15-366 to change the emission limits and the Additional Special Terms and Conditions.	OAC rule 3745-17-07	For unpaved roadways and parking areas, there shall be no visible particulate emissions except for three minutes during any 60-minute period.
	OAC rule 3745-17-08	Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Section A.I.2.b. through m.)
		See Part II, A.3.
		See Part II, A.3

2. Additional Terms and Conditions

- 2.a The paved roadways that are covered by this permit and subject to the above-mentioned requirements are listed below:

paved roadways:

permanent facility entrance road

The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

unpaved roadways:

all facility roads except the permanent facility entrance road; dirt and gravel covered

unpaved parking areas:

dirt and gravel covered parking areas

- 2.b The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned (A.I.1.) applicable emissions limitations. The permittee shall apply water or suitable dust suppression chemicals on all unpaved roads and parking areas at sufficient treatment frequencies to ensure compliance. This requirement shall not apply when the temperature is below 32° F. The permittee shall operate and maintain a truck-mounted spray system or an equivalent system to distribute water and/or dust suppression solution on unpaved roadways and parking areas. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c For unpaved roadways and parking areas, the needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d On unpaved roadways and parking areas, speed zones of no more than 15 miles per hour shall be established, posted and enforced by the facility owner or operator for all vehicles operating within the facility or facility-controlled access roads.
- 2.e Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be considered as a paved roadway or parking area, and controlled with the control measure specified above for paved surfaces.
- 2.f The permittee shall employ best available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned (A.I.1.) applicable emissions limitations. The permittee shall apply water or suitable dust suppression chemicals on the unpaved shoulders of all paved roads at sufficient treatment frequencies to ensure compliance. This requirement shall not apply when the temperature is below 32° F. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.g The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned (A.I.1.) applicable emissions limitations. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by wet sweeping at sufficient treatment frequencies to ensure compliance. A new permanent facility entrance road shall be in use by October 1, 1992. This permanent entrance shall include at least 2700 feet of paved roadway. Rumble strips and a wheel and undercarriage washing station shall be installed on this new permanent road. The tires and undercarriage of all vehicles exiting unpaved landfill roadways shall be washed as necessary to eliminate the tracking of mud onto paved roadways. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.h The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.i For paved roadways, the needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.j On paved roadways, speed zones of no more than 25 miles per hour shall be established, posted and enforced by the facility owner or operator for all vehicles operating within the facility or facility-controlled access roads.
- 2.k If mud or dirt is deposited onto Gracemont Street, it shall be cleaned off as soon as possible, but at least by the end of each workday.
- 2.l Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times.
- 2.m Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

II. Operational Restrictions

- 1. This facility shall be limited to accepting no more than 140,000 truck loads of materials per calendar year.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

Paved roadways and parking areas:

(by group or individually)

Minimum inspection frequency:

Daily, by 12:00 Noon, on days of operation only.

Unpaved roadways and parking areas:

(by group or individually)

Minimum inspection frequency:

Twice daily, by 12:00 Noon and by the end of the day, on days of operation only.

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended.
3. The permittee may, upon receipt of written approval from the City of Canton Health Department, Air Pollution Control Division, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection in which implementation of any control measure was suspended if unsafe or hazardous driving conditions would have been created by its use.

The reason why the control measure was suspended shall also be recorded.

- c. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- d. the dates the control measures were implemented, the control measures that were implemented, and an identification of the sections of the paved and unpaved roadways and parking lots on which the control measures were implemented;
- e. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures, and the total number of days that a control method was suspended if unsafe or hazardous driving conditions would have been created by its use.

The information required above shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- f. the number of truck loads of materials accepted by the facility in each calendar month and in each calendar year.

IV. Reporting Requirements

- 1. The permittee shall submit written deviation reports which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit. These written deviation reports shall be submitted in accord with this permit including General Term and Condition A.1.c.iii. Of this permit. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual written report, which states that no deviations occurred during that period. These reports shall include, but not be limited to, any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure that was to be implemented as a result of an inspection was not implemented including those instances when a control measure was not implemented if unsafe or hazardous conditions would have been created by its use.
- 2. The permittee shall submit annual Particulate Emissions reports by January 31 of every year covering the previous calendar year's particulate emissions. Each report shall contain:
 - a. a title and the calendar year which the report covers;
 - b. the number of truck loads of material accepted by the facility during the calendar year which the report covers;
 - c. the actual, annual PM emissions in TPY from the paved surfaces;

- d. the actual, annual PM10 emissions in TPY from the paved surfaces;
- e. the actual, annual PM emissions in TPY from the unpaved surfaces;
- f. the actual, annual PM10 emissions in TPY from the unpaved surfaces;
- g. the actual, annual PM emissions in TPY from all the surfaces; and
- h. the actual, annual PM10 emissions in TPY from all the surfaces.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1. of these Additional Special Terms and Conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
PM emissions shall not exceed 89.6 tons/yr.

Applicable Compliance Method:

The permittee shall calculate the annual PM emissions from the facility's roadways utilizing AP-42 predictive equations.

Paved Roadways

The uncontrolled emission factor for the emissions from the paved roadways shall be calculated using equation 1 of the 1/95 version of the Fifth Edition of AP-42 section 13.2.1.3.

$$E = k (sL/2)^{0.65} (W/3)^{1.5} \quad \text{Equation 1}$$

where:

E = PM emission factor, lbs. of PM emitted per vehicle mile traveled (VMT) without the use of control measures

k = 0.082 lb/VMT, particle size multiplier for PM from page 13.2.1-3

sL = 0.0012 lb/square foot, road surface silt loading, from Table 13.2.1-1 for a municipal solid waste landfill (the table value is 7.4 g/square meter)

W = 44.5 tons mean vehicle weight.

The calculated value of E = 0.0377 lb PM emissions per VMT (uncontrolled)

The annual fugitive PM emissions from the paved roadways shall be calculated using the above-calculated emission factor E, the average distance traveled on paved roadways by a truck traveling on the paved roadways, the number of such trucks traveling on the facility's

paved roadways in the year, and the control efficiency of the control methods utilized by the facility. The average number of wheels per vehicle and the average vehicle loaded weight was established in a survey of the vehicles utilizing the facility's roadway during a three-day period in summer, 1999. The overall control efficiency for wet sweeping, speed reduction, and other control measures identified in the Additional Terms and Conditions of this permit shall be based on information in the Ohio EPA "Reasonably Available Control Measures for Fugitive Dust Sources".

The annual, controlled, PM emissions for the paved roadways is equal to the product of the uncontrolled emission factor, E [0.0377 lb PM emissions per VMT], the average distance traveled on paved roadways by a truck traveling on the paved roadways [1.5 miles], the number of such trucks traveling on the facility's paved roadway in the year, the overall control efficiency [1 minus the overall fractional control efficiency 0.85 = 0.15], and 1 ton per 2000 lbs.

Unpaved Roadways

The PM emissions from the unpaved roadways shall be calculated using equation 1 of the 1/95 version of the Fifth Edition of AP-42 section 13.2.2.3.

$$E = k (5.9) (s/12) (S/30) (W/3)^{0.7} (w/4)^{0.5} ((365-p)/365)$$

where:

E = PM emission factor, lbs. of PM emitted per vehicle mile traveled (VMT) without the use of control measures

k = 0.80 lb/VMT, particle size multiplier for PM from page 13.2 2-3

s = 6.4% silt content from Table 13.2.2-1 for municipal solid waste landfills

S = 15 mph, mean vehicle speed

W = 44.5 tons mean vehicle weight

w = 12 wheels per mean vehicle

p = 150 days per year with at least 0.01 inches of precipitation from Figure 13.2.2-4

The calculated value of E = 8.48 lbs PM emissions per VMT (uncontrolled)

The annual PM emissions from the unpaved roadways shall be calculated using the above-calculated emission factor E, the average distance traveled on unpaved roadways by a truck traveling on the unpaved roadways, the number of such trucks traveling on the facility's unpaved roadways in the year, and the control efficiency of the control methods utilized by the facility. The average number of wheels per vehicle and the average vehicle loaded weight

was established in a survey of the vehicles utilizing the facility's roadway during a three-day period in summer, 1999. The overall control efficiency for watering, speed reduction, and other control measures identified in the Additional Terms and Conditions of this permit shall be based on information in the Ohio EPA "Reasonably Available Control Measures for Fugitive Dust Sources".

The annual, controlled, PM emissions for the unpaved roadways is equal to the product of the uncontrolled emission factor, E [8.48 lbs PM emissions per VMT], the average distance traveled on unpaved roadways by a truck traveling on the unpaved roadways [1 mile], the number of such trucks traveling on the facility's unpaved roadway in the year, the overall control efficiency [1 minus the overall fractional control efficiency $0.85 = 0.15$], and 1 ton per 2000 lbs.

The calculated, annual, controlled PM emissions from the paved and unpaved roadways shall be summed. If this sum is less than 89.6 TPY particulate emissions, then compliance will be shown.

- b. Emissions Limitation:
For paved roadways, there shall be no visible particulate emissions except for one minute during any 60-minute period.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

- c. For unpaved roadways, there shall be no visible particulate emissions except for three minutes during any 60-minute period.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

None

lfg operations requirements from PTI 15-1305 (emissions unit P003) into this PTI, and other miscellaneous changes.

PTI 15-679 issued August 21, 1991, was a modification of previously issued PTI 15-366 to change the emission limits and the Additional Special Terms and Conditions.

OAC rule 3745-17-07, and
OAC rule 3745-17-08

40 CFR, Part 61, Subpart A, General Provisions, and 40 CFR, Part 61, Subpart M, National Emission Standard for Asbestos

40 CFR, Part 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills.

6.49 lbs NOx/Hr
28.5 TPY NOx

0.53 lb SO2/Hr
2.30 TPY SO2

2.52 lbs HCl/Hr
11.1 TPY HCl

0.30 lb PM/Hr
1.31 TPY PM

For all waste materials except RACM:

See part II, A.3.

For RACM:

Use of handling procedures and control measures, as defined in the "Additional Terms and Conditions" Section 2.c, "NESHAP disposal requirements for RACM", to prevent the emissions of fugitive dust.

See section A.I.2.d. through f.

2. Additional Terms and Conditions

2.a Best Available Technology (BAT) control measures for the disposal of MSW have been determined to be in compliance with the following:

- i. The permittee shall ensure that solid wastes are deposited, spread and compacted in such a manner as to minimize or prevent visible emissions of dust. All vehicles hauling wastes shall be closed, covered, or tarped entering or leaving the facility in order to minimize or eliminate load loss. All truckloads of solid waste shall be unloaded in a manner which shall minimize the drop height of the solid wastes. Any dusty materials or wastes likely to become airborne shall be watered as necessary prior to or during dumping operations in order to minimize or eliminate visible emissions of fugitive dust. Watering shall be conducted in such a manner as to avoid the pooling of liquids and runoff. No dusty material shall be dumped during periods

of high wind speed (>20 MPH), unless the material has been treated to prevent fugitive dust emissions from becoming airborne.

In accordance with the permittee's permit application, the permittee has committed to minimizing drop heights and watering of dusty materials, either prior to dumping or during dumping, and good operating practices to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- ii. any dusty material to be stored, prior to disposal, shall be watered, as necessary, or have a temporary soil cover in order to minimize or eliminate visible emissions of fugitive dust.
 - iii. The "Dusty Load Handling Procedures" described in the January 31, 1995 letter from Mr. Greg Terwilliger of Countywide Recycling and Disposal facility to Mr. Rick Miller of the Canton City Health Department, Air Pollution Control Division shall be employed to minimize or eliminate fugitive dust emissions.
 - iv. The above-mentioned control measures shall be employed for each MSW landfill cell if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to minimize or eliminate fugitive dust emissions. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.
 - v. The permittee shall employ reasonably available control measures for wind erosion from the surface of the landfill for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to watering, as necessary, to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
 - vi. The above-mentioned control measures shall be employed for wind erosion from the landfill if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to minimize or eliminate fugitive dust emissions. Implementation of the control measure(s) shall not be necessary for the landfill cell that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate fugitive dust emissions.
- 2.b** BAT control measures for the disposal of Regulated Asbestos Containing Material (RACM) have been determined to be:

- i. compliance with the NESHAP, Subpart M;

- ii. deposition and burial operations shall be conducted in a careful manner that prevents RACM from being broken up or dispersed before the materials are buried;
- iii. as soon as practicable after the placement of RACM, but no later than the end of each working day, the RACM deposited at the facility during the operating day shall be covered with at least twelve (12) inches of non-asbestos material or an alternate daily cover if prior written permission has been obtained for the use of the alternate daily cover from the Ohio EPA Division of Solid and Infectious Waste Management (DSIWM). Once the RACM is covered, the area may be compacted.
- iv. RACM shall be separated from the landfill final grade by no less than 12 inches of compacted nonasbestos-containing materials and a permanent cover of vegetation, or in accordance with the current requirements for closure contained in the facility's DSIWM permit, whichever is more stringent.
- v. The permittee shall implement and maintain an "Asbestos Waste Disposal Operating Procedure and Spill Contingency Plan" ("Plan") consisting of: authorized personnel training, inspection and disposal operating procedures, non-conforming load response procedures, inventory and maintenance procedures for safety and emissions control equipment, record keeping procedures, and emergency notification procedures. Authorized personnel shall be knowledgeable in the procedures, and the Plan shall be available for inspection at this facility at all times.
- vi. Emissions control equipment shall be available for wetting and containing asbestos in the event of a release or non-conforming load disposal. All equipment required to implement the "Asbestos Waste Disposal Operating Procedure and Spill Contingency Plan" shall be maintained in accordance with good engineering practices to ensure that the equipment is in a ready-to-use condition and in an appropriate location for use.
- vii. If, on the basis of the inspection required to be performed by A.I.2.c.(i), the waste material is found to be improperly received, the load shall be disposed of in accordance with the procedures in the "Asbestos Waste Disposal Operating Procedure and Spill Contingency Plan".

2.c NESHAP Disposal requirements for RACM:

- i. The permittee shall inspect each load of RACM delivered to the facility. The inspection shall consist of a visual examination to ensure that each shipment of RACM is received in intact, leak-tight containers labeled with appropriate hazard warning labels, the name of the waste generator, and the location of waste generation. The inspection shall also determine whether the waste shipment records accompany the consignment and accurately describe the waste material and quantity.

If, on the basis of the inspection, the waste material is found to be improperly received, the discrepancy shall be noted on the waste shipment record.

- ii. The permittee shall cover and compact asbestos wastes in accordance with the following:
 - (a) as soon as practicable after the placement of friable asbestos, but no later than the end of each working day, the RACM deposited at the site during the operating day shall be covered with at least 6 inches of nonasbestos-containing materials (see A.I.2 b.iii, also); and
 - (b) care shall be taken to ensure that disposed asbestos shall not be re-excavated in subsequent operations. Any accidentally exposed material shall be immediately recovered in accordance with the provisions of subpart (a), immediately preceding.
- iii. The permittee shall establish restricted access, adequate to deter the unauthorized entry of the general public and any unauthorized personnel, within 100 feet of the unloading, deposition, and burial areas for the RACM. A hazard warning shall be displayed on signs not less than 20 X 14 inches in size, posted so they are visible before entering an area with asbestos waste disposal operations in progress; or alternatively, mark vehicles used to transport RACM with 21 X 14 inch signs so that the signs are displayed in such a manner and location that a person can easily read the legend. Display the following legend in the lower panel with letter sizes and styles of a visibility at least equal to those specified in this paragraph.

Legend:

DANGER
ASBESTOS DUST HAZARD
CANCER AND LUNG DISEASE HAZARD
Authorized Personnel Only

Notation:

2.5 cm (1 inch) Sans Serif, Gothic or Block
2.5 cm (1 inch) Sans Serif, Gothic or Block
1.9 cm (3/4 inch) Sans Serif, Gothic or Block
14 Point Gothic

Spacing between any two lines must be at least equal to the height of the upper of the two lines.

- 2.d The active lfg collection system shall satisfy the following requirements, as specified in 40 CFR Part 60.752(b)(2)(ii)(A):
 - i. The system shall collect gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of 5 years or more if active, or 2 years or more if closed or at final grade.

- ii. The system shall collect gas at a sufficient extraction rate.
 - iii. The system shall be designed to minimize off-site migration of subsurface gas.
- 2.e The collected lfg shall be vented to an open flare designed and operated as follows:
- i. The flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
 - ii. The flare shall be operated with a flame present at all times.
 - iii. The permittee shall comply with either the requirements in paragraphs (a) and (b) or the requirements in paragraph (c) below:
 - (a) Flares shall be used only with the net heating value of the gas being combusted being 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted; or with the net heating value of the gas being combusted being 7.45 MJ/scm (200 Btu/scf) or greater if the flare is non-assisted. The net heating value of the gas being combusted shall be determined as follows:
$$H_t = k \times (\text{the summation of } C_i H_i \text{ for } i=1 \text{ through } i=n)$$

Where

H_t = net heating value of the sample, MJ/scm; where the net enthalpy per mole of off gas is based on combustion at 25 degrees C and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20 degrees C;

k = constant, 1.740×10^{-7} (1/ppm) (g mole/scm) (MJ/kcal) where the standard temperature for (g mole/scm) is 20 degrees C.

C_i = concentration of sample component i in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946-77; and

H_i = net heat of combustion of sample component i , kcal/g mole at 25 degrees C and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 (incorporated by reference as specified in Section 60.17) if published values are not available or cannot be calculated.
 - (b) A steam-assisted and non-assisted flare shall be designed for and operated with an exit velocity of less than 18.3 m/sec (60 ft/sec), except:
 - (i) a steam-assisted and non-assisted flare shall be designed for and operated with an exit velocity of equal to or greater than 18.3 m/sec (60 ft/sec), but less than 122 m/sec (400 ft/sec) are allowed if the net

heating value of the gas being combusted is greater than 37.3 MJ/scm (1,000 Btu/scf); and

- (ii) a steam-assisted and non-assisted flare shall be designed for and operated with an exit velocity of less than the velocity, V_{max} , and less than 122 m/sec (400 ft/sec) are allowed; as determined by

$$\text{Log}_{10}(V_{max}) = (Ht + 28.8)/31.7$$

where

V_{max} = maximum permitted velocity, M/sec,
 28.8 = constant
 31.7 = constant
 Ht = the net heating value as determined in section A.I.2.e.iii.a. above

- (c) Flares shall be used that have a diameter of 3 inches or greater, are non-assisted, have a hydrogen content of 8.0 percent (by volume), or greater, and are designed for and operated with an exit velocity less than 37.2 m/sec (122 ft/sec) and less than the velocity, V_{max} , as determined by the following equation:

$$V_{max} = (X_{h2} - K1) * K2$$

where:

V_{max} = maximum permitted velocity, m/sec.

$K1$ = constant, 6.0 volume-percent hydrogen

$K2$ = constant, 3.9(m/sec)/volume-percent hydrogen

X_{h2} = the volume-percent of hydrogen, on a wet basis, as calculated by using the American Society for Testing and Materials (ASTM) Method D1946-77

- iv. Air-assisted flare shall be designed for and operated with an exit velocity of less than the velocity, V_{max} , as determined by the following equation:

$$V_{max} = 8.706 + 0.7084 (Ht)$$

where

V_{max} = maximum permitted velocity, m/sec

8.706 = constant

0.7084 = constant

Ht = the net heating value as determined in section A.I.2.e.iii.a. above

- 2.f The collection and control system may be capped or removed provided that all of the following conditions, as specified in 40 CFR Part 60.752(b)(2)(v), are met:
- i. The landfill shall be no longer accepting solid waste and shall be permanently closed (pursuant to 40 CFR Part 258.60).
 - ii. The collection and control system shall have been in operation a minimum of 15 years.
 - iii. The calculated NMOC gas produced by the landfill shall be less than 55 TPY on three successive test dates. The test dates shall be no less than 90 days apart, and no more than 180 days apart.

II. Operational Restrictions

1. This facility shall be limited to accepting for disposal no more than 1,560,000 tons of waste (the total of all types of waste) per calendar year (BAT).
2. This facility shall be limited to accepting for disposal no more than 1,000 tons of Regulated Asbestos Containing Material (RACM) per day and 312,000 tons of RACM per calendar year (BAT).
3. The permittee shall be limited to inputting to the flare less than or equal to 3,500 dscf of landfill gas per minute and 1,840 million dscf of landfill gas per year.
4. The permittee shall operate the collection system such that gas collected from each area, cell, or group of cells in the MSW landfill in which solid waste has been in place for 5 years or more if active, or for 2 years or more if closed or at final grade.
5. The permittee shall operate the collection system with negative pressure at each wellhead except under the following conditions:
 - a. a fire or increased well temperature; (The permittee shall record instances when positive pressure occurs in efforts to avoid a fire.)
 - b. use of a geomembrane or synthetic cover; (The permittee shall develop acceptable pressure limits in the design plan.)
 - c. a decommissioned well; (A well may experience a static positive pressure after shutdown to accommodate for declining flows. All design changes shall be approved by the Director of Ohio EPA.)
6. The permittee shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius and with either a nitrogen level less than 20% or an oxygen level less than 5%. The permittee may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration shall show supporting data that

the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.

7. The permittee shall operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill.
8. The permittee shall operate the collection system such that all collected gases are vented to a control system designed and operated in compliance with A.L.2.e. In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within one hour.
9. The permittee shall operate the flare at all times when the collected gas is routed to the system.
10. A pilot flame shall be maintained at all times in the flare's pilot light burner.

III. Monitoring and/or Recordkeeping Requirements

1. BAT Monitoring and Record Keeping Requirements for the Material Handling Operations for the Landfill Disposal of MSW and RACM.
 - a. Monitoring requirements
 - i. Except as otherwise provided in this section, the permittee shall perform inspections of the landfill operation areas in accordance with the following frequencies:

<u>landfill areas:</u>	<u>minimum inspection frequency:</u>
all landfill areas	daily
 - ii. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for PM. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a landfill operating area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
 - iii. The permittee may, upon receipt of written approval from the Canton City Health Department, Air Pollution Control Division, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

- iv. The permittee shall maintain a wind speed indicator to determine whether the wind is in excess of the 20 MPH limit.

- b. The permittee shall maintain records of the following information:
 - i. the following information associated with Additional Term and Condition A.II.1.a. and its subsections:
 - (a) the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - (b) the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - (c) the dates the control measures were implemented;
 - (d) on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures; and
 - (e) the records required in this Additional Term and Condition shall be kept separately for (i) the solid waste load-in operations, (ii) the surface working operations, and (iii) the cell surface (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
 - ii. records of the dates that watering was performed prior to or during dumping operations of any dry materials, or materials likely to become airborne, in order to minimize or eliminate visible emissions of fugitive dust;
 - iii. records of the dates that material was treated to prevent fugitive dust emissions from becoming airborne during periods of high wind speed;
 - iv. records of any days that dusty materials to be stored prior to disposal were watered or covered with a temporary soil cover in order to minimize or eliminate visible emissions of fugitive dust;
 - v. monthly records of the tons of MSW waste disposed;
 - vi. the waste shipment record form for each shipment of RACM;
 - vii. the location, depth, area, and quantity in cubic yards of all RACM within the disposal site recorded on a map or diagram of the disposal area; and
 - viii. for at least 5 years, up-to-date, readily accessible, on-site records of the maximum design capacity of the landfill, the current amount of solid waste in place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are

retrievable within 4 hours. Either hardcopy or electronic formats are acceptable. These records may also be required by the OEPA, Division of Solid and Infectious Waste Management, and shall satisfy this permit condition.

2 Monitoring and Record Keeping Requirements for the MSW lfg operations

- a. For the active gas collection system, the permittee shall install a sampling port and a thermometer or other temperature measuring device at each wellhead and record the following information on a monthly basis:
 - i. the gauge pressure in the gas collection header at each individual well;
 - ii. the nitrogen or oxygen concentration in the landfill gas. The nitrogen level shall be determined using Method 3C of 40 CFR, Part 60, Appendix A, unless an alternative test method is established as allowed by 40 CFR, Part 60.752(b)(2)(i), or, the oxygen level shall be determined by an oxygen meter using Method 3A of 40 CFR, Part 60, Appendix A, unless an alternative test method is established as allowed by 40 CFR, Part 60.752(b)(2)(i), except that:
 - (a) the span shall be set so that the regulatory limit is between 20 and 50% of the span;
 - (b) a data recorder is not required;
 - (c) only two calibration gases are required, a zero and span, and ambient air may be used as the span;
 - (d) a calibration error check is not required; and
 - (e) the allowable sample bias, zero drift, and calibration drift are plus or minus 10%.
 - iii. the temperature of the landfill gas.
- b. The permittee shall monitor surface concentrations of methane on a quarterly basis as follows:
 - i. For each collection area in which the collection system is required to be operated by the NSPS WWW, monitor surface concentrations of methane along the entire perimeter of the collection area, along a serpentine pattern spaced 30 meters apart (or a site-specific spacing established in the permittee's surface monitoring design plan, which may exclude unsafe areas), and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover.

- ii. The background concentration shall be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells.
- iii. Surface emission monitoring shall be performed in accordance with section 4.3.1 of Method 21 of Appendix A of 40 CFR, Part 60, except that the probe inlet shall be placed within 5 to 10 centimeters of the ground. Monitoring shall be performed during typical meteorological conditions.
- iv. Any reading of 500 parts per million or more above background at any location shall be recorded as a monitored exceedance and the actions specified below shall be taken. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements listed in A.II.7.:
 - (a) The location of each monitored exceedance shall be marked and the location recorded.
 - (b) Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be remonitored within 10 calendar days of detecting the exceedance.
 - (c) If the remonitoring of the location shows a second exceedance, additional corrective action shall be taken and the location shall be monitored again within 10 days of the second exceedance. If the remonitoring shows a third exceedance for the same location, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding time line for installation may be submitted to the Ohio EPA for approval. No further monitoring of that location is required until the action specified has been taken.
 - (d) Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10-day remonitoring specified above shall be remonitored 1 month from the initial exceedance. If the 1-month remonitoring shows a concentration less than 500 parts per million above background, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month remonitoring shows an exceedance, the actions specified above shall be taken.
- c. The permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications and shall maintain records as indicated for the following equipment:
 - i. a heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame;

- ii. The permittee shall properly install, operate, and maintain a device to continuously monitor the flare pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The permittee shall record the following information each day:
 - (a) all periods during which there was no pilot flame; and
 - (b) the downtime for the flare and monitoring equipment when the collection and control system is in operation.
 - iii. a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes, or, if a gas flow rate measuring device is not installed, then the permittee shall secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.
 - d. The permittee shall maintain, for the life of the collection system, an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector.
 - e. The permittee shall maintain monthly records of the amount of landfill gas, in scf, inputted to the flare and the number of hours that the flare was operated.
 - f. The permittee shall maintain monthly records of any malfunctions when unburned landfill gas was released from the flare.
3. The permittee shall maintain the following information for the life of the lfg control equipment as measured during the initial performance test or compliance demonstration:
- a. The maximum expected gas generation flow rate as calculated based on the following:
 - i. For sites with unknown year-to-year solid waste acceptance rate:
$$Q_m = 2L_o \times R \times \{(e \text{ to the power } -kc) - (e \text{ to the power } -kt)\}$$
where,
 - Q_m = maximum expected gas generation flow rate, cubic meters per year
 - L_o = methane generation potential, cubic meters per megagram solid waste
 - R = average annual acceptance rate, megagrams per year
 - k = methane generation rate constant, per year

t = age of the landfill, in years, at equipment installation plus the time the owner or operator intends to use the gas mover equipment or active life of the landfill, whichever is less. (If the equipment is installed after closure, t is the age of the landfill at installation.)

c = time since closure, years (for an active landfill c = 0 and (e to the power -kc) = 1)

ii. For sites with known year-to-year solid waste acceptance rate:

$$Q_m = \text{Summation of } 2kL_oM_i \times (e \text{ to the power } -kt_i \text{ for } i=1 \text{ through } i=n)$$

where,

Q_m = maximum expected gas generation flow rate, cubic meters per year

k = methane generation rate constant, per year

L_o = methane generation potential, cubic meters per megagram solid waste

M_i = mass of solid waste in the ith section, megagrams

t_i = age of the ith section, years

iii. If a collection and control system has been installed, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, the equations in paragraphs A.III.5.i. and ii. If the landfill is still accepting waste, the actual measured flow data will not equal the maximum expected gas generation rate, so calculations using the equations in paragraphs A.III.5.i. or ii or other methods shall be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment. (The permittee may use another method to determine the maximum gas generation flow rate if the method has been approved by the Ohio EPA.);

- b. the density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 40 CFR Part 60.759(a)(1);
- c. the flare type (i.e., steam-assisted, air-assisted, or non-assisted);
- d. all visible emission readings;
- e. heat content determinations of the gas;
- f. flow rate or bypass flow rate measurements;
- g. exit velocity determinations made during the performance test as specified in 40 CFR Part 60.18; and
- h. continuous records of the flare pilot flame or flare flame monitoring and records of all periods of operations during which the flare pilot flame or flare flame is absent.

IV. Reporting Requirements

1. 40 CFR, Part 61, Subparts A & M (NESHAP) Reporting requirements for landfills which dispose of RACM:
 - a. The permittee shall submit quarterly reports summarizing the asbestos disposal activities. These quarterly asbestos disposal activity reports shall be submitted not later than January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters. The reports shall contain the following information:
 - i. the name, address and location of the facility, the calendar period covered by the report and any changes in the methods of storage or the disposal operations; and
 - ii. a list of all asbestos-containing waste consignments received including: the date received, the name of the waste generator, the name and location of the facility where the load originated, the quantity of asbestos, and any discrepancy or non-conformity discovered.

- b. As soon as possible and no longer than 30 days after receipt of the waste, the permittee shall send a copy of the signed waste shipment record to the waste generator.

Upon discovering a discrepancy between the quantity of waste designated on a waste shipment record and the quantity actually received, the permittee shall attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the state, local, district, or USEPA regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different than the above, the Canton City Health Department, Air Pollution Control Division. Describe the discrepancy and attempts to reconcile it and submit a copy of the waste shipment record along with the report.

- c. The permittee shall submit, upon closure of the facility, a copy of the records of the asbestos waste disposal locations and quantities.
- d. The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided at least 10 working days before excavation begins, and in no event shall excavation begin earlier than the date specified in the original notification. The following information shall be included in the notice:
 - i. scheduled starting and completion dates;
 - ii. reason for disturbing the waste

- iii. procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated RACM (if deemed necessary, the Director may require changes in the proposed emission control procedures); and
- iv. location of any temporary storage site and the final disposal site.

2. BAT reporting requirements for the disposal of RACM

The permittee shall notify the Canton City Health Department, Air Pollution Control Division of any load of asbestos-containing material which is rejected, or any non-conforming load disposed of in accordance with the "Asbestos Waste Disposal Operating Procedure and Spill Contingency Plan". Notification shall be provided as soon as possible by a phone contact, followed in writing by the next working day. The written notification shall provide a copy of the waste shipment record ("WSR"), if available, or when waste is not shipped with a WSR, provide available information concerning vehicle identification, source of the load, a description of the load, nature of discrepancy, and the location of disposal. If possible, non-conforming loads of suspect friable material shall be detained, or the location of disposal protected from damage, until the Ohio EPA is informed and provided the opportunity to inspect.

3. BAT Reporting Requirements for the Control Measure Performance of the Material Handling Operations for the Landfill Disposal of MSW:

The permittee shall submit an annual report to the Canton City Health Department, Air Pollution Control Division, by January 31 of each year, covering the previous calendar year, containing all the dates that each control measure (required to be recorded in term and condition B.III.1.b and following subsections) was implemented. This report shall also contain the tons of MSW disposed each month and the tons of MSW disposed in the year.

- 4. An annual report shall be submitted by this facility to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544. This report shall be submitted by January 31 of each year and shall address the data obtained during the previous year. This report shall contain the amount of landfill gas input to the flare and the actual, annual NMOC emissions in TPY. The report shall include all the data, calculations, sample reports, and measurements used to estimate the actual, annual emissions.
- 5. An annual report shall be submitted by this facility to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544. This report shall be submitted by January 31 of each year and shall address the data obtained during the previous year. This report shall contain the tons of MSW disposed in each month and the tons of MSW disposed in the year at the facility.
- 6. Drawings of the landfill gas collection system, as built, shall be submitted to the Canton City Health Department, Air Pollution Control Division within 90 days of the date of the issuance of this permit, and such drawings shall also be maintained at the facility. The drawings shall include locations of the wells and trenches, well depths, pipe lengths, pipe diameters, condensate traps, the layout of the system, and any other relevant information.

7. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure that was to be implemented as a result of an inspection was not implemented.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I.1. of these Additional Special Terms and Conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
Material handling operations for the disposal of MSW: PM emissions shall not exceed 5.0 tons/yr.

Applicable Compliance Method:

Utilize the RACM emission factor of 0.046 ton PM emitted per acre per year (RACM pg. 2-79, Equation 1, mineral extraction, wind erosion from topsoil). The maximum acreage to be utilized is 3, per the permit application.

The calculated annual amount of tons of PM emitted = $(0.048 \text{ ton PM/acre-year})(3 \text{ acres})$
The calculated annual amount of tons of PM emitted = 0.144 ton.

Compliance is shown because the calculated annual PM emissions (0.144 TPY) was less than or equal to the allowable annual PM emissions (5.0 TPY).

- b. Emissions Limitation:
This facility shall ensure that solid wastes are deposited, spread and compacted in such a manner as to minimize or prevent visible emissions of fugitive dust.

Applicable Compliance Method:

Compliance shall be met by performing the required control measures in accordance with A.I.2.a.i. and compliance shall be demonstrated by maintaining the records in accordance with A.III.1.b. and subsections and submitting the reports in accordance with A.IV.3. and, if required, use of Method 22 of 40 CFR, Part 60, Appendix A in accordance with OAC rule 3745-17-03 (B)(4).

c. Emissions Limitation:

Any dusty materials or wastes likely to become airborne shall be watered, as necessary, prior to or during dumping operations in order to minimize or eliminate visible emissions (for the disposal of MSW).

Applicable Compliance Method:

Compliance shall be met by performing the required control measures in accordance with A.I.2.a.i. and compliance shall be demonstrated by maintaining the records in accordance with A.III.1.b.ii and submitting the reports in accordance with A.IV.3. and, if required, use of Method 22 of 40 CFR, Part 60, Appendix A in accordance with OAC rule 3745-17-03 (B)(4).

d. Emissions Limitation:

No dusty material shall be dumped during periods of high wind speed unless it has been treated to prevent it from becoming airborne.

Applicable Compliance Method:

Compliance shall be met by performing the required control measures in accordance with A.I.2.a.i and compliance shall be demonstrated by maintaining the records in accordance with A.III.1.b.ii and submitting the reports in accordance with A.IV.3. and, if required, use of Method 22 of 40 CFR, Part 60, Appendix A in accordance with OAC rule 3745-17-03(B)(4).

e. Emissions Limitation:

Any dusty material to be stored prior to disposal shall be watered, as necessary, or have a temporary soil cover in order to minimize or eliminate visible emissions (for all waste materials except RACM).

Applicable Compliance Method:

Compliance shall be met by performing the required control measures in accordance with A.I.2.a.ii. and compliance shall be demonstrated by maintaining the records in accordance with A.III.1.b.iv and submitting the reports in accordance with A.IV.3. and, if required, use of Method 22 of 40 CFR, Part 60, Appendix A in accordance with OAC rule 3745-17-03 (B)(4).

f. Emissions Limitation:

For material handling operations for the disposal of RACM : PM emissions shall not exceed 0.5 ton/yr.

Applicable Compliance Method:

The fugitive dust emissions calculations by G. Rizzo Associates, Inc. received 07/20/95 for the unloading and spreading of C&D material for PTI modification 15-0766 gave an hourly PM emissions rate of 0.00275 lb per year. Assume that this emissions rate applies to this facility's RACM disposal also. The maximum amount of RACM to be handled per calendar year is 312,000 tons.

The calculated maximum annual amount of tons of PM emitted = (0.00275 lb PM emitted per ton of RACM handled)(312,000 tons maximum of RACM handled per calendar year (1 ton per 2,000 lbs) = 0.43 ton PM emitted per calendar year.

Compliance is shown because the calculated maximum annual PM emissions (0.43 TPY) was less than or equal to the allowable annual PM emissions (0.50 TPY).

- g. Emissions Limitation:
No visible emissions (for RACM).

Applicable Compliance Method:

Use of Method 22 of 40 CFR, Part 60, Appendix A in accordance with OAC rule 3745-17-03 (B)(4).

- h. Emissions Limitation:
No visible emissions from the flare, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22, and procedures specified in 40 CFR Part 60.18.

- i. Emissions Limitation:
36.7 lbs CO/hour

Applicable Compliance Method :

Compliance with this emission limitation shall be calculated in accordance with the Permit to Install application number 15-1305 dated March 1997, and, by compliance with the Special Terms and Conditions for this emissions unit of this permit.

- j. Emissions Limitation:
161 TPY CO

Applicable Compliance Method :

The TPY emission limitation was developed by multiplying the calculated hourly CO emission rate from above by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- k. Emission Limitation :
6.49 lbs NOx/hour

Applicable Compliance Method :

Compliance with this emission limitation shall be calculated in accordance with the Permit to Install application number 15-1305 dated March 1997, and, by compliance with the Special Terms and Conditions for this emissions unit of this permit.

- l. Emissions Limitation:
28.5 TPY NO_x

Applicable Compliance Method :

The TPY emission limitation was developed by multiplying the calculated hourly NO_x emission rate from above by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- m. Emissions Limitation:
0.53 lb SO₂/hour

Applicable Compliance Method :

Compliance with this emission limitation shall be calculated in accordance with the Permit to Install application number 15-1305 dated March 1997, and, by compliance with the Special Terms and Conditions for this emissions unit of this permit.

- n. Emissions Limitation:
2.30 TPY SO₂

Applicable Compliance Method -

The TPY emission limitation was developed by multiplying the calculated hourly SO₂ emission rate from above by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- o. Emissions Limitation:
2.52 lbs HCl/hour

Applicable Compliance Method :

Compliance with this emission limitation shall be calculated in accordance with the Permit to Install application number 15-1305 dated March 1997, and, by compliance with the Special Terms and Conditions for this emissions unit of this permit.

- p. Emissions Limitation:
11.1 TPY HCl

Applicable Compliance Method :

The TPY emission limitation was developed by multiplying the calculated hourly HCl emission rate from above by the maximum operating schedule of 8760 hours/year and

dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- q. Emissions Limitation:
1.1 lbs NMOC/hour

Applicable Compliance Method :

Compliance with this emission limitation shall be calculated in accordance with the Permit to Install application number 15-1305 dated March 1997, and, by compliance with the Special Terms and Conditions for this emissions unit of this permit.

- r. Emissions Limitation:
4.80 TPY NMOC

Applicable Compliance Method :

The TPY emission limitation was developed by multiplying the calculated hourly NMOC emission rate from above by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- s. Emission Limitation :
0.30 lb PM/hour

Applicable Compliance Method :

Compliance with this emission limitation shall be calculated in accordance with the Permit to Install application number 15-1305 dated March 1997, and, by compliance with the Special Terms and Conditions for this emissions unit of this permit.

- t. Emissions Limitation:
1.31 TPY PM

Applicable Compliance Method :

The TPY emission limitation was developed by multiplying the calculated hourly PM emission rate from above by the maximum operating schedule of 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

2. Initial flare performance test; the permittee shall conduct or have conducted, within 90 days after the installation of the collection and control system, an initial performance test to demonstrate that the flare can operate in conformance with the requirements specified in 40 CFR Part 60.18. The net heating value of the gas being combusted in the flare and the actual exit velocity of the flare shall be determined in accordance with the procedures and methods specified in 40 CFR Part 60.18. The visible emission evaluation shall be conducted in accordance with the procedures specified in Section A.V.1.h.

VI. Miscellaneous Requirements

1. Requirements for the MSW landfill gas (lfg) operations including the active lfg collection system (fugitive Non-Methane Organic Compound (NMOC) emissions) and open flare lfg control system (flare emissions)
 - a. The equipment associated with this emissions unit shall be operated and maintained by personnel properly trained in its operation.
 - b. The utility flare shall be designed, installed, and operated in accordance with the Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 60.750 to 60.759, as indicated in these Terms and Conditions, in accordance with 40 CFR 60.18 (b) to (f), and in accordance with the PTI 15-1305 application.
 - c. Design, construction, and siting of the gas extraction wells and collection system shall be in accordance with the PTI 15-1305 application, this PTI, the Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 60.750 to 60.759 as indicated in these Terms and Conditions and with standard industry methods and practices currently in use.
 - d. Any section of landfill material exposed during construction shall be covered as soon as possible once construction of that section is complete.
 - e. During construction, all working areas, construction spoils and unpaved roadways associated with the emissions unit shall be watered down as necessary to minimize dust.
 - f. After the installation of a collection and control system in compliance with 40 CFR Part 60.755, the permittee shall calculate the NMOC emission rate for the purposes of determining when the system can be removed as provided in 40 CFR Part 60.752(b)(2)(v) in accordance with the equation and procedures specified in 40 CFR Part 60.754(b), (b)(1), and (b)(2). The permittee may use another method to determine landfill gas flow rate and NMOC concentration if the method has been approved by the Ohio EPA as provided in 40 CFR Part 60.752(b)(2)(i)(B).
 - g. If an alternate use of the landfill gas becomes available, any necessary permits shall be obtained in accordance with general term and condition B.1 and the flare shall be maintained as a backup landfill gas control system.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
<p>F002: Landfill Operations: (1) material handling operations for the disposal of Municipal Solid Waste (MSW) (fugitive particulate emissions), (2) material handling operations for the disposal of National Emissions Standards for Hazardous Air Pollutants, Regulated Asbestos Containing Material (NESHAP RACM) (fugitive particulate emissions), and, (3) MSW landfill gas (lfg) operations including the active lfg collection system (fugitive Non-Methane Organic Compound (NMOC) emissions) and open flare lfg control system (flare emissions).</p>	<p>OAC Chapter 3745-20-06</p>	<p>There shall be no visible particulate emissions during transportation, transfer, unloading, deposition or compacting operations of asbestos-containing waste materials.</p>
<p>This PTI is a modification of PTI 15-679 issued August 21, 1991 and PTI 15-1305 issued 2/4/98. This PTI supersedes PTI 15-679 and PTI 15-1305. The modifications are to allow the acceptance of NESHAP.</p>		<p>See section B.I.2.a.</p>
<p>RACM for disposal and to incorporate the lfg operations</p>		

VI. Miscellaneous Requirements

None