

COPY



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2328

MAILING ADDRESS:

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

Re: Permit to Install
Stark County
Application No: 15-1305
NSPS

CERTIFIED MAIL

February 4, 1998

COUNTYWIDE RECYCLING & DISPOSAL FACILITY
TIM VANDERSALL
3619 GRACEMONT STREET, SW
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 with the Environmental Review Appeals Commission 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 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

Very truly yours,

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

cc: US EPA
CANTON AIR POLLUTION CONTROL



Permit to Install Terms and Conditions

Application No. 15-1305
APS Premise No. 1576001579
Permit Fee: \$800.00

Name of Facility: COUNTYWIDE RECYCLING & DISPOSAL FACILITY

Person to Contact: TIM VANDERSALL

Address: 3619 GRACEMONT STREET, SW
EAST SPARTA, OH 44626

Location of proposed source(s): 3619 GRACEMONT STREET, SW
PIKE TOWNSHIP, OHIO

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

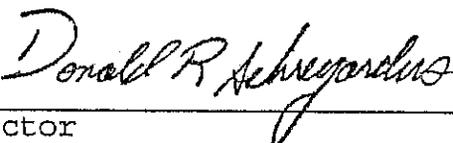
Date of Issuance: February 4, 1998

Effective Date: February 4, 1998

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 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 and regulations.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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There shall be no visible emissions from the flare except for periods of time not to exceed a total of 5 minutes during any 2 consecutive hours.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
CO	161
NO _x	28.5
SO ₂	2.30
HCL	11.1
NMOC	4.80
PM	1.31

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P003	Landfill gas extraction system	WWW

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

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Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and Canton Air Pollution Control
420 Market Ave. N., City Hall
Canton, Ohio 44702-1544

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.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The collected gas shall be routed to an open flare control system designed and operated to reduce NMOC's by 98 weight-percent, at maximum inlet concentration. The flare shall be operated with a flame at all times waste gas is being vented to it.
2. The permittee shall operate the collection and control systems in accordance with 40 CFR 60.753.
3. The permittee shall operate the collection system such that the methane concentration is less than 500 parts per million above background at the surface of the landfill.
4. 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.
5. If alternate use(s) of the landfill gas becomes available, after the required permits are obtained in accordance with E.3.g. herein, the flare shall be maintained as a backup landfill gas system.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall monitor the operations in accordance 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 (a)(1) through (a)(3);
 - b. for the open flare, monitor as per paragraph (c) and it's related subsections.

The permittee shall operate and maintain a heat sensing device (a thermocouple) and associated controller at the pilot light to indicate the continuous presence of a flame.

If the thermocouple detects a no flame conditions and the flame cannot be restarted after three tries, the system shall automatically shut down the flow of landfill gas to the flare.

The thermocouple shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals; and,

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- c. for the surface methane operational standard, monitor as per paragraph (f).
2. The flare shall be monitored as per 40 CFR Part 60.18 (d) to ensure that it is operated and maintained in conformance with its design.
3. At a minimum, the initial performance test of the flare shall consist of a demonstration that the visible emissions limitation is being met and the flare's exit velocity meets the requirements in 40 CFR 60.18. Records for the initial performance test are required in 40 CFR Part 60.758 (b) (4).
4. 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.
5. The permittee 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. The permittee shall maintain records in accordance 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 the permittee to the Canton City Health Department, Air Pollution Control Division. This report shall contain the amount of landfill gas input to the flare. This report shall be submitted by February 1 of each year and shall address the data obtained during the previous calendar 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:

The Ohio EPA, Division of Air Pollution Control, Authorization and Compliance Unit, P.O. Box 1049, Columbus, Ohio 43266-1049; and,

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

4. The permittee shall submit any and all reports in accordance with the Standards of Performance for Municipal Solid Waste Landfills, Section 60.757. The reports shall be submitted to: (1) Director, Air Management Division, US Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604 (original), (2) The Ohio EPA, Division of Air Pollution Control, Authorization and Compliance Unit, P.O. Box 1049, Columbus, Ohio 43216-1049 (copy), and (3) The Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702 (copy):
 - a. an amended design capacity report required by paragraph (a)(3) shall be submitted, if necessary;
 - b. 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;
 - c. the permittee shall submit the collection and control system design plan required in 60.757(c) in accordance with this section if not already submitted;

- d. the permittee shall submit a closure report required by paragraph (d) within thirty (30) days of waste acceptance cessation;
- e. the permittee shall submit an equipment removal report required by paragraph (e) thirty (30) days prior to removal or cessation of operation of the control equipment;
- f. the permittee shall submit annual reports in accordance 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,
- g. the permittee shall submit the information required in Section 60.757 (g)(1) through (6) with the initial performance 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);

- a. Emission Limitation

There shall be no visible emissions from the flare except for periods of time not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method

Reference Method 22 shall be used with an observation period of two hours.

- b. Emission Limitation

Methane concentration less than 500 PPM above background at the surface of the landfill.

Applicable Compliance Method

The permittee shall conduct emission testing for the methane concentration emission limit at the frequency specified in 40 CFR 60.755(c) utilizing the test methods specified in 40 CFR 60.755(d).

E. Miscellaneous

1. 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, these Additional Special Terms and Conditions, in accordance with 40 CFR 60.18(b) to (f), and in accordance with the PTI application.

2. Design, construction, and siting of the gas extraction wells and collection system shall be in accordance with the Standards of Performance for Municipal Solid Waste Landfills, 40 CFR 60.750 to 60.759, these Additional

Special Terms and Conditions, the PTI application, and with standard industry methods and practices currently in use.

3. Other Requirements

- a. The permittee shall meet the Standards of Performance for Municipal Solid Waste Landfills in accordance with the Standards for air emissions from municipal solid waste landfills, Section 60.752, as clarified, as follows:

- i. paragraphs (b) (2), and (b) (2) (iii) (A), and (b) (2) (iv); and,

- ii. paragraph (b) except that:

- aa. the owner or operator of the MSW landfill must meet paragraph (b) (2) and not (b) (1); and,

- ab. the owner or operator of the MSW landfill shall install an active collection and control system per paragraphs (b) (2) (ii), (b) (2) (ii) (A), (b) (2) (ii) (A) (1) through (b) (2) (ii) (A) (4).

- b. the equipment associated with this emissions unit shall be operated and maintained by personnel properly trained in its operation;

- c. any section of the 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 permittee 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 reasonable mitigation measures. Odor

mitigations 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. the permittee 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 the Permit to Install, including a landfill gas fired boiler or generator, without first obtaining a Permit to Install from the Ohio EPA; and,
- 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.