



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/20/2013

Certified Mail

John Butler
Rumpke Sanitary Landfill, Inc.
10795 Hughes Road
Cincinnati, OH 45251-4598

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1431092049
Permit Number: P0112360
Permit Type: OAC Chapter 3745-31 Modification
County: Hamilton

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/pemitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
SWOQA; Indiana; Kentucky



Response to Comments

Facility ID:	1431092049
Facility Name:	Rumpke Sanitary Landfill, Inc.
Facility Description:	Municipal Solid Waste Landfill
Facility Address:	10795 Hughes Road Cincinnati, OH 45251-4598 Hamilton County
Permit:	P0112360, Permit-to-Install - OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the <i>The Cincinnati Enquirer</i> on 01/26/2013. The comment period ended on 04/08/2013.	
Hearing Date	04/02/2013
Hearing Public Notice Date	02/22/2013

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. General Comments

Comment: A commenter raised the possibility of migrating gas posing an explosion threat to homes and schools located nearby.

Response: A team of federal, state and local landfill experts reviewed the situation with the reaction in the north end of the landfill at Rumpke. After review, Ohio EPA issued Director's Final Findings and Orders (DFFOs) on March 18, 2010, and March 27, 2012, requiring an action plan. The action plan addresses steps to be taken to control gas, odors and leachate. There has been no evidence of off- site gas migration.

Comment: A comment was received in support of the actions Rumpke has taken.

Response: No changes are needed to the permit based upon this comment.



Comment: A commenter stated he was a toxicologist for U.S. EPA for 36 years and he reviewed the material safety data (MSD) sheets and it appears the materials are non-toxic compounds.

Response: No changes are needed to the permit based upon this comment.

Comment: Commenters asked what steps are being taken to eliminate the source of odor.

Response: Ohio EPA issued DFFOs on March 18, 2010, and March 27, 2012 to address the reaction in the northern portion of the landfill. It included 26 action items, one of which was the implementation of an "odor control" plan.

2. Public Health Comments

Comment: A number of commenters expressed concern over the possible health effects and/or long-term risks of Novo Air, and reported adverse physical reactions to the product.

Response: Federal and state air regulatory standards are in place to ensure the public's health is not jeopardized by the operation of air contaminant sources. Rumpke's deodorizing system, which is considered an air contaminant source, is in compliance with all of these standards. Due to the level of concern expressed by the community, a request was made to an Ohio EPA toxicologist to conduct a detailed review of the process and materials used to see whether they were safe. After the review, the following statement was issued, "Using the information provided to Ohio EPA, we observe nothing in that information that would give cause for potential health effects when used in the manner prescribed in the permit. No U.S. EPA or Ohio EPA air toxics permitting thresholds are exceeded by the compound's formulation. Persons believed to be experiencing any irritation caused by the compound's use should contact their local health care physician or health care provider."

Review of the MSD sheets for Novo Air products does not show any air toxic contaminants as listed in Ohio Administrative Code (OAC) rule 3745-114, any hazardous air pollutants in Section 112 of the Clean Air Act, or any compounds with a threshold limit value (TLV) established to ensure there are no adverse health effects.

Comment: Commenters raised questions concerning whether the ingredients in Novo Air products were proven to be safe, since MSD sheets did not list specific ingredients. Commenters noted that propylene glycol was employed as an antifreeze agent and that the MSD sheets for propylene glycol stated that it may cause irritation in sensitive individuals. If so, why it is being used?

Response: MSD sheets are required by federal law to list any compounds with a TLV. Compounds with a TLV can have health-related concerns. There are no compounds in any of the products used in the deodorizing system at Rumpke with a TLV. There also are no compounds employed in the deodorizer that are listed as chemicals of concern under Ohio EPA's air toxics policy.



Ohio EPA understands commenters' concerns about the possibility that some chemicals may cause irritation to some individuals. However, Ohio EPA is limited by its legal authority to restrict the use of some chemicals that fall outside both state and federal rules and policies. As stated in previous responses, Ohio EPA reviewed stated information, including the application, to ensure the public's safety is maintained by any products used.

Comment: Several commenters asked what testing has been done to insure that no public safety health risk exists, since there has been a large increase in odor complaints. One commenter wanted to know where the 21 monitoring stations were.

Response: Since 2010, the Southwest Ohio Air Quality Agency (Agency) has conducted air monitoring in Colerain Township in the vicinity of the Rumpke Landfill for methane, hydrogen sulfide, carbon monoxide and volatile organic compounds (VOCs), including more than 60 organic air toxics. Monitoring was conducted for particulate matter 10 microns in diameter or less (PM10) between 2009 and 2012 on Struble Road near Colerain Avenue.

In 2010, the Agency operated a fixed monitoring site near Bank and Hughes roads to measure various VOC emissions. The following is a link which will provide further information, including the air monitoring results:

<http://www.southwestohioair.org/air-quality-data/colerain-monitoring/colerain-voc-results.html>

The Agency continues to conduct weekly air monitoring around the landfill using portable instruments. If real-time sampling of VOCs shows a concentration of 500 parts per billion (ppb) during a sustained period of one minute at any of the 18 monitoring sites, the Agency will take a canister sample immediately. These canisters are tested for organic compounds of concern. Three additional sites are monitored on a periodic basis at the request of the Metropolitan Sewer District (MSD). The following link provides the location of the 18 monitoring sites:

<http://www.southwestohioair.org/air-quality-data/colerain-monitoring/instantaneous-results.html>

The Agency monitors three additional sites on a periodic basis for MSD at 3627 Struble Road, 10157 Season Drive and 9627 Marino Drive.

Ohio EPA and U.S. EPA established 500 ppb as a threshold because individual VOCs less than this concentration would have no short-term health impact. During 2012 and to date in 2013, no canister samples were taken based on the above criteria. The Agency has also had a citizen take a canister sample when the deodorizer odor was present. The analysis of this air sample resulted in non-detectable measured levels for all toxics



except acetone. The acetone level was similar to levels measured at other air toxics sites in southwest Ohio.

Based on an ongoing review of the air emission data collected to date, there is no immediate short- or long-term health threat from the contaminants being measured.

3. Permitting Issues

Comment: Commenters questioned the technical basis for allowing annual emissions to increase and expressed opposition to approval of a permit to increase by 300 percent the airborne dispersal of an odor masking agent.

Response: OAC and the Code of Federal Regulations (CFR) establish air-related applicable requirements that facilities are required to comply with to obtain installation and operating permits. These applicable requirements are wide-ranging and can go from annual facility wide emission limitations down to hourly pollutant-specific emission limitations. For a facility to be issued an installation or operating permit, it is required to be in compliance with all applicable requirements. Should the facility demonstrate it will be in compliance with all applicable requirements, the permit would be issued. The annual organic compound emissions increase requested by Rumpke complies with all applicable state and federal air pollution regulations. Therefore, the permit was issued.

Comment: Commenters asked the objective for this permit change.

Response: Rumpke has asked for an increase in emissions so that they have the ability to use more deodorizing material to help control odors.

Comment: Commenters asked for the monitoring, record-keeping and reporting requirements of this permit.

Response: The permit contains limits on the TOC input of the deodorizing agents, along with the allowable amount of organic compound (OC) emissions. Rumpke must keep records of the amount, in gallons, of the deodorizing agent and antifreeze used, along with the OC content. Rumpke must submit quarterly deviation reports and an annual OC emissions report.

Comment: Ohio EPA should deny this request by Rumpke to increase the amount of deodorizer.

Response: OAC and CFR establish air-related applicable requirements with which facilities must comply to obtain installation and operating permits. These applicable requirements are wide ranging and can go from annual facility wide emission limitations down to hourly pollutant-specific emission limitations. For a facility to be issued an installation or operating permit, it is required to be in compliance with all applicable requirements. Should the facility demonstrate it would be in compliance with all applicable requirements, the permit would be issued. The annual OC emissions increase



requested by Rumpke complies with all applicable state and federal air pollution regulations. Therefore, the permit was issued.

Comment: A commenter stated that Rumpke has not used best available technology (BAT).

Response: OAC rule 3745-31-05(A) specifies the requirements for BAT be employed. In this case, Rumpke submitted an air permit application to increase the amount of deodorizing material used in air contaminant source P003 (deodorizing operations). This resulted in a calculated increase in OC emissions emitted over what was previously allowable thereby triggering the requirements to apply for and obtain a new air permit and BAT.

Both the Agency and Ohio EPA reviewed existing, as well as previous, BAT determinations for similar deodorizing operations at landfill operations in Ohio and determined that what is listed as BAT in the draft air permit complies with the requirements of BAT.

As part of that BAT determination, both the Agency and Ohio EPA note that approximately 99 percent of the deodorizing material sprayed into the air from P003 is water. Only 1 percent is a deodorant and non-VOC that make up the OC emissions requested. Those OC emissions, as stated elsewhere in this document, are non-hazardous.

Comment: A commenter had concerns about information submitted by Veteran Enterprises LLC since the site listed in the application appeared to be a storage facility with no activity.

Response: Based on updated information submitted by Rumpke, the company does not use nor plan to use Veteran Enterprise LLC odor control products. These products were previously used and are therefore included in the original application.

4. Subsurface Reaction Area and Associated Odors

Comment: Commenters stated that increasing the airborne dispersal of an odor-masking agent is directly related to the need to cover the odor resulting from the landfill fire which began in 2009, and has now grown to encompass approximately 56 acres.

Response: A team of federal and state landfill experts reviewed the situation at Rumpke. After review, Ohio EPA issued DFFOs on March 18, 2010, and March 27, 2012, requiring an action plan. The action plan addresses steps to be taken to control gas, odors and leachate. In addition to employing the corrective measures in the DFFOs, Rumpke is attempting to minimize off-site odors by employing a deodorant/neutralization system.

Comment: Commenters stated that as the fire continues to burn, it has created an odor detectable across multiple townships, and has released unknown chemicals, compounds and particles into the atmosphere. Commenters stated a desire that



Rumpke Sanitary Landfill extinguish the expanding landfill fire before considering a proposal to increase the atmospheric dispersal of any odor masking chemical.

Response: A team of federal and state landfill experts reviewed the situation at Rumpke. After review, Ohio EPA issued DFFOs on March 18, 2010, and March 27, 2012, requiring an action plan. The action plan addresses steps to be taken to control gas, odors and leachate. In addition to employing the corrective measures in the DFFOs, Rumpke is attempting to minimize off-site odors by employing a deodorant/neutralization system.

Since 2010, the Agency has conducted air monitoring in Colerain Township, in the vicinity of the Rumpke Landfill, for methane, hydrogen sulfide, carbon monoxide and VOCs, including more than 60 organic air toxics. Monitoring for PM10 was conducted between 2009 and 2012.

In 2010, the Agency operated a fixed monitoring site near Bank and Hughes roads to measure various VOCs. The following is a link which will provide further information, including the air monitoring results:

<http://www.southwestohioair.org/air-quality-data/colerain-monitoring/colerain-voc-results.html>

The Agency continues to conduct weekly air monitoring around the landfill using portable instruments. If real-time sampling of VOCs shows a concentration of 500 parts per billion (ppb) during a sustained period of one minute at any of the 18 monitoring sites, the Agency will take a canister sample immediately; these canisters are tested for organic compounds of concern.

Based on an ongoing review of the air emission data collected to date, there is no immediate short- or long-term health threat from the contaminants being measured.

Comment: What happened to the “lid” that was going to be installed to help control odors?

Response: Rumpke has installed approximately 56 acres of an odor-control blanket to help capture emissions from the northern portion of the landfill where the reaction is taking place. The associated wells and piping, in conjunction with the odor-control blanket, captured approximately six million cubic feet of gas per day from this area in April 2013. The captured gas was then flared off to destroy odorous compounds.

5. Legal Issues

Comment: Commenters questioned whether Rumpke is in violation of Ohio Revised Code (ORC) and OAC rules 3745-27-19, (Operation of a Sanitary Landfill) and 3745-15-07 (Air Pollution Nuisances prohibited) due to off-site odors and the use of the odor control material.



Response: Ohio EPA issued DFFOs on March 18, 2010, and March 27, 2012. The March 27, 2012, DFFOs determined that Rumpke had failed to strictly control odors at the facility, and that Modified Findings and Orders were necessary to address ongoing odor issues. The March 27, 2012, DFFOs required Rumpke to take additional actions to control odors from the reaction area.

Comment: Commenters stated that NXC Technologies Inc., the supplier of Novo Air products, was not incorporated in Ohio, in violation of Ohio law. The permit application is therefore invalid, and Ohio EPA should further investigate the validity of the company and its products. A commenter quoted a Cincinnati.com article, "The owner of NXC Technologies said his firm is incorporated and that he is a licensed chemist." Ohio EPA should have documented proof of where the company is incorporated and what government agency issued his license. Also, the manufacturer of one chemical, Veteran Enterprises, has a listed address for its storage facility, but there is no activity at the site. There is something not right with this company.

Response: Ohio EPA does not investigate ownership, incorporation status or licensure of a permit applicant's suppliers. The assumption is made that the applicant will use products as described in the application. Anyone with knowledge of illegal activities should contact local law enforcement.

Comment: The application submitted by Rumpke is fraudulent.

Response: To date, the Agency has no knowledge of any fraudulent information being submitted in the permit-to-install application for the deodorizer system at the landfill.

End of Comments



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Rumpke Sanitary Landfill, Inc.**

Facility ID: 1431092049
Permit Number: P0112360
Permit Type: OAC Chapter 3745-31 Modification
Issued: 6/20/2013
Effective: 6/20/2013



Division of Air Pollution Control
Permit-to-Install
for
Rumpke Sanitary Landfill, Inc.

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Final Permit-to-Install
Rumpke Sanitary Landfill, Inc.
Permit Number: P0112360
Facility ID: 1431092049
Effective Date: 6/20/2013

Authorization

Facility ID: 1431092049
Facility Description: municipal solid waste landfill
Application Number(s): A0046180
Permit Number: P0112360
Permit Description: Chapter 31 modification to increase allowable annual emission rate.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$200.00
Issue Date: 6/20/2013
Effective Date: 6/20/2013

This document constitutes issuance to:

Rumpke Sanitary Landfill, Inc.
10795 Hughes Road
Cincinnati, OH 45251-4598

of a Permit-to-Install for the emissions unit(s) identified on the following page.

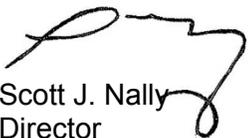
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally
Director



Final Permit-to-Install
Rumpke Sanitary Landfill, Inc.
Permit Number: P0112360
Facility ID: 1431092049
Effective Date: 6/20/2013

Authorization (continued)

Permit Number: P0112360

Permit Description: Chapter 31 modification to increase allowable annual emission rate.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P003
Company Equipment ID:	Deodorizing Operations
Superseded Permit Number:	P0105842
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Rumpke Sanitary Landfill, Inc.
Permit Number: P0112360
Facility ID: 1431092049
Effective Date:6/20/2013

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- 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, 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 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.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Southwest Ohio Air Quality Agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Southwest Ohio Air Quality Agency every six months, 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.
 - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. 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 Southwest Ohio Air Quality 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).

6. Compliance Requirements

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



- c) 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:
 - (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.
- d) The permittee shall submit progress reports to the Southwest Ohio Air Quality 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting 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 Southwest Ohio Air Quality 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 Southwest Ohio Air Quality 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 (i.e., postmarked) quarterly, 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.



Final Permit-to-Install
Rumpke Sanitary Landfill, Inc.
Permit Number: P0112360
Facility ID: 1431092049
Effective Date:6/20/2013

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Rumpke Sanitary Landfill, Inc.
Permit Number: P0112360
Facility ID: 1431092049
Effective Date:6/20/2013

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



Final Permit-to-Install
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C. Emissions Unit Terms and Conditions



1. P003, Deodorizing Operations

Operations, Property and/or Equipment Description:

odor control deodorizing system

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	<p>Emissions of organic compounds (OC) shall not exceed 157.38 lbs/hr.</p> <p>The hourly emission limitation specified above represents the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with this emission limitation.</p> <p>The requirements of this rule also include compliance with OAC rule 3745-31-05(D). See b)(2)a.</p>
b.	ORC 3704.03(T)	<p>OC emissions shall not exceed 34.17 tons per rolling, 12-month period.</p> <p>See c)(1).</p>
c.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Nonattainment New Source Review	<p>OC emissions shall not exceed 34.17 tons per rolling, 12-month period.</p> <p>See c)(1).</p>

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph



(A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the OC emissions, upon issuance of this permit.

c) Operational Restrictions

(1) The total OC input from deodorizing agents employed in emissions unit P003 (Deodorizing Operations) shall not exceed 34.17 tons per year (TPY). Compliance with the above limitation shall be based upon a rolling, 12 month-summation of the OC input. The OC input shall be determined by multiplying the number of gallons of each deodorizing agent employed per month by the OC content of each deodorizing agent, in pounds per gallon. The OC input of deodorizing agents shall be assumed to be 100 percent of the OC content of the deodorizing agents employed and, as such, is equivalent to the OC emission rate. In addition, the facility may use antifreeze (typically propylene glycol) as necessary during periods of cold temperatures with some of its deodorizing agents. Based on estimated volatilization factors using the chemical properties and vapor pressure of antifreeze (typically propylene glycol) and accounting for its use only during cold temperatures periods, only a small portion will be emitted (6.14% by weight for propylene glycol). The OC input of antifreeze shall be determined by multiplying the number of gallons employed per month by its OC content. The OC emissions of antifreeze shall be calculated by multiplying the OC input by the estimated volatilization factor. If antifreeze is employed, total OC emissions from deodorizing agents and antifreeze (if employed) shall not exceed 34.17 tons per year (TPY) with compliance based on a rolling 12-month summation of the OC emissions.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

- a. the name and identification for each deodorizing agent employed;
- b. the number of gallons of each deodorizing agent employed;
- c. the OC content of each deodorizing agent, in pounds per gallon;
- d. the deodorizing agent OC input and OC emissions, in tons;
- e. the rolling, 12-month summation of the monthly deodorizing agent OC input and the total OC emissions from deodorizing agents and antifreeze, in tons;



- f. the name and identification of each antifreeze employed;
- g. the number of gallons of each antifreeze employed;
- h. the OC content of each antifreeze employed, in pounds per gallon;
- i. the OC volatilization factor for each antifreeze employed;
- j. the antifreeze OC input and OC emissions, in tons; and
- k. the total OC emissions from deodorizing agents and antifreeze, in tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of all exceedances of the rolling, 12-month summation of the monthly OC emission rate, in tons.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall also submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Emissions of organic compounds (OC) shall not exceed 157.38 lbs/hr.

Applicable Compliance Method(s):

The hourly OC emission rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: (maximum deodorizing agent application rate of 129 gallons per hour) x (1.22 lbs of OC per gallon of deodorizing agent).



b. Emission Limitation:

OC emissions shall not exceed 34.17 tons/yr, based on a rolling, 12-month summation.

Applicable Compliance Method(s):

Compliance with the annual OC emission limitation above shall be based upon the record keeping requirements as specified in d)(1).

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install.