

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

3/7/2014

Certified Mail

Michael Crisenbery  
Spring Grove Resource Recovery Inc  
4879 Spring Grove Ave  
Cincinnati, OH 45232

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431072600  
Permit Number: P0115864  
Permit Type: Renewal  
County: Hamilton

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. 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 PTIO 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](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.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](http://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: SWOAQA



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Spring Grove Resource Recovery Inc**

Facility ID:	1431072600
Permit Number:	P0115864
Permit Type:	Renewal
Issued:	3/7/2014
Effective:	3/7/2014
Expiration:	3/7/2019





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Spring Grove Resource Recovery Inc

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**Final Permit-to-Install and Operate**  
Spring Grove Resource Recovery Inc  
**Permit Number:** P0115864  
**Facility ID:** 1431072600  
**Effective Date:** 3/7/2014

## Authorization

Facility ID: 1431072600  
Application Number(s): A0049389, A0049661  
Permit Number: P0115864  
Permit Description: Renewal FEPTIO for a waste materials reclamation facility.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 3/7/2014  
Effective Date: 3/7/2014  
Expiration Date: 3/7/2019  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Spring Grove Resource Recovery Inc  
4879 SPRING GROVE AVE.  
Cincinnati, OH 45232

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

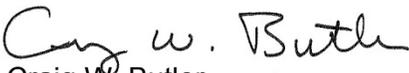
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0115864

Permit Description: Renewal FEPTIO for a waste materials reclamation facility.

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

<b>Emissions Unit ID:</b>	<b>J001</b>
Company Equipment ID:	Loading rack for organic materials
Superseded Permit Number:	P0098571
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Solidification
Superseded Permit Number:	P0111698
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	Drum crushing operation
Superseded Permit Number:	P0098570
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	Transformer decommissioning
Superseded Permit Number:	P0098569
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P016</b>
Company Equipment ID:	Fuel Dispersion
Superseded Permit Number:	P0098568
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P019</b>
Company Equipment ID:	Vacuum truck operation
Superseded Permit Number:	P0098566
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T016</b>
Company Equipment ID:	WWT tank TK 11 17,500 gallon
Superseded Permit Number:	P0098563
General Permit Category and Type:	Not Applicable

**Group Name: 10350 Gallon WWT Tanks**

<b>Emissions Unit ID:</b>	<b>T012</b>
Company Equipment ID:	WWT tank TK1 10,350 gallon
Superseded Permit Number:	P0098562
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T013</b>
Company Equipment ID:	WWT tank TK 2 10,350 gallon
Superseded Permit Number:	P0098562
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T014</b>
Company Equipment ID:	WWT tank TK3 10,350 gallon
Superseded Permit Number:	P0098562
General Permit Category and Type:	Not Applicable



<b>Emissions Unit ID:</b>	<b>T015</b>
Company Equipment ID:	WWT tank TK4 10,350 gallon
Superseded Permit Number:	P0098562
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T017</b>
Company Equipment ID:	WWT tank TK12 10,350 gallon
Superseded Permit Number:	P0098562
General Permit Category and Type:	Not Applicable

**Group Name: 15,000 Gallon F.R.S.T**

<b>Emissions Unit ID:</b>	<b>T008</b>
Company Equipment ID:	Fuel tank 7
Superseded Permit Number:	P0098564
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T009</b>
Company Equipment ID:	Fuel tank 8
Superseded Permit Number:	P0098564
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T010</b>
Company Equipment ID:	Fuel tank 9
Superseded Permit Number:	P0098564
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T011</b>
Company Equipment ID:	Fuel tank 10
Superseded Permit Number:	P0098564
General Permit Category and Type:	Not Applicable

**Group Name: 7000 Gallon F.R.S.T**

<b>Emissions Unit ID:</b>	<b>T005</b>
Company Equipment ID:	Fuel tank 6
Superseded Permit Number:	P0098565
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T006</b>
Company Equipment ID:	Fuel tank 5
Superseded Permit Number:	P0098565
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
Spring Grove Resource Recovery Inc  
**Permit Number:** P0115864  
**Facility ID:** 1431072600  
**Effective Date:** 3/7/2014

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
Spring Grove Resource Recovery Inc  
**Permit Number:** P0115864  
**Facility ID:** 1431072600  
**Effective Date:** 3/7/2014

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) B.2. thru B.6.
2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units J001, P001, P004, P005, P015 – P019, T005, T006, T008 – T017, other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records of existing sources to demonstrate compliance with this limitation upon issuance of this permit.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:
  - a) The name and identification number of each organic material processed;
  - b) The individual Hazardous Air Pollutant (HAP)\* content for each HAP of each organic material, in pounds of individual HAP per gallon of organic material, as processed;
  - c) The total combined HAP content of each organic material in pounds of combined HAPs per gallon of organic material, as processed [sum all the individual HAP contents from b)];
  - d) The number of gallons of each organic material processed;
  - e) The total individual HAP usage for each HAP from all organic materials processed, in pounds or tons per month [for each HAP the sum of b) times d) for each material (and divided by 2000 lbs/ton if the units are in tons)];
  - f) The total combined HAP usage from all organic materials processed, in pounds or tons per month [the sum of c) times d) for each material (and divided by 2000 lbs/ton if the units are in tons)];
  - g) The updated rolling, 12-month summation of usage for each individual HAP emissions\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and



- h) The updated rolling, 12-month summation of usage for total combined HAP emissions\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

Note: A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Southwest Ohio Air Pollution Control Agency. This information does not have to be kept on an individual emissions unit basis.

\* This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

- 4. The permittee shall submit quarterly deviation (excursion) reports which identify:
  - a) Any exceedance of the rolling, 12-month HAP emission limitations outlined in 2. above;
  - b) the probable cause of each deviation (excursion);
  - c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

- 5. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:
  - a) Emission Limitations:
    - (1) Actual emissions of Hazardous Air Pollutants (HAPs) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, as a 12-month rolling summation, as specified in 2. above.

Applicable Compliance Method:

Compliance with the 12-month rolling HAP limitations shall be demonstrated by the record keeping identified in 3. above.

- 6. The permittee shall not process any benzene NESHAP waste as referenced by 40 CFR, Part 61, Subpart FF, Section 61.340 in this emissions unit.



**Final Permit-to-Install and Operate**  
Spring Grove Resource Recovery Inc  
**Permit Number:** P0115864  
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**Effective Date:** 3/7/2014

## **C. Emissions Unit Terms and Conditions**



**1. J001, Loading rack for organic materials**

**Operations, Property and/or Equipment Description:**

Loading Rack with carbon adsorption

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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)	This emission unit was installed under Permit to Install 14-0453. There were no emission limitations or control measures established under PTI 14-0415.
b.	OAC rule 3745-21-07(M)(1)&(2).	See b)(2)a.

(2) Additional Terms and Conditions

a. This emission unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least 85% cent, by weight. Currently the organic compound emissions are vented through a carbon absorption system.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis or at intervals no greater than 20% of the design carbon replacement interval, whichever is greater:
  - a. the VOC concentration from the carbon canister(s) outlet venting to the atmosphere (ie. outlet concentration);
  - b. the VOC concentration from the storage tank vent line prior to the carbon canister(s) (ie. inlet concentration);
  - c. the % overall organic compound control efficiency  $[1 - \frac{d(1)a}{d(1)b}] * 100$ ;
- (2) Should the % overall organic compound control efficiency recorded in d)(1)c. be less than 85%, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
  - a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.
- (3) In response to each investigation required in d)(2) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit (85% control efficiency), unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:
  - a. a description of the corrective action;
  - b. the date corrective action was completed;
  - c. the date and time the deviation ended;
  - d. the total period of time during which there was a deviation;
  - e. the control efficiency of the carbon canisters immediately after the corrective action was implemented; and
  - f. the name(s) of the personnel who performed the work.



Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) As an alternative to conducting the monitoring specified in d)(1)-d(3), an owner or operator may replace the carbon in the carbon adsorption system with fresh carbon at a regular, predetermined time interval that is less than the carbon replacement interval that is determined at the maximum design flow rate and the maximum VOC concentration in the gas stream vented to the carbon adsorption system. Should the permittee choose this option the following information shall be maintained:
  - a. calculations determining the carbon replacement interval based on the maximum design flow rate and maximum VOC Concentration; and
  - b. the dates when the carbon in the carbon adsorption system was replaced.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- 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. Control Measure:

The permittee shall operate and maintain a fixed-roof closed vent system that routes all organic vapors vented from the tank to a carbon adsorption system with a minimum control efficiency of 85% by weight.



**Final Permit-to-Install and Operate**  
Spring Grove Resource Recovery Inc  
**Permit Number:** P0115864  
**Facility ID:** 1431072600  
**Effective Date:** 3/7/2014

Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(1)c.

- g) Miscellaneous Requirements
  - (1) None.



**2. P001, Solidification**

**Operations, Property and/or Equipment Description:**

Solidification process

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. g)(1).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)d., c)(1), d)(2), e)(2), and f)(1)b.
- 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	Compliance with this rule is equivalent to the work practice standards established in accordance with OAC rule 3745-17-08.  See c)(2) through c)(5).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b.
c.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3)	Emissions of volatile organic compounds (VOC) shall not exceed 17.28 pounds per batch of waste materials.
d.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V operating permit requirements for volatile organic compounds(VOC)	Emissions of VOC shall not exceed 35.94 TPY based on a rolling, 12-month summation.  See c)(1).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
f.	OAC rule 3745-17-08	See c)(2) through c)(5).

(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. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions from this air contaminant source since the uncontrolled potential to emit for PM10 is less than 10 tons/year.

The "Best Available Technology (BAT)" requirements under OAC rule 3745-31-05(A)(3) are not applicable to the particulate emissions (PE) emitted from this emissions unit (PE is emitted in the form of filterable PM10 emissions). BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant without an established NAAQS.

This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

c) Operational Restrictions

(1) The maximum annual production rate for the VOC containing material processed through this emissions unit shall not exceed 11,981 tons per year, based upon a rolling, 12-month summation of the production rate.

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 production rate, upon issuance of this permit.



- (2) The solidification/stabilization process:
    - a. The solidification/stabilization process shall be located within a 3-sided enclosure in order to minimize or eliminate visible emissions of fugitive dust.
    - b. Prior to using any solidification material other than sawdust in this emissions unit, the permittee shall notify the Southwest Ohio Air Quality Agency so visible emissions readings can be conducted to determine compliance with the visible particulate emission limitation in term b)(1)e. If compliance is demonstrated with the new material, this Agency will send a letter approving the use of the new material in this emissions unit.
  - (3) Front-end loader:
    - a. The scoop/bucket of the front loader shall not exceed 3 cubic yard.
    - b. During the addition of solidification material to the solidification/stabilization process, the drop height of the front-end loader shall not exceed five feet in order to minimize or eliminate visible emissions of fugitive dust.
    - c. The permittee shall employ reasonably available control measures on the handling of the solidification material 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 minimizing the drop height of the front end loader bucket to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
  - (4) Storage Area:
    - a. The solidification material in the storage area shall be covered during times when the emissions unit is not in operation.
    - b. The height of the solidification material in the storage area shall not exceed eight feet.
  - (5) The permittee shall employ reasonably available control measures for wind erosion from the surfaces of all storage piles 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 minimizing the height of the storage piles to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain the following daily records:
    - a. the number of batches processed;
    - b. the amount, in pounds, of VOC containing material processed; and



- c. the pounds of VOC emitted per batch processed.
- (2) The permittee shall maintain monthly records of the following information:
- a. the total amount of VOC containing material processed for each month;
  - b. the rolling, 12-month summation of the production rate.
  - c. the total VOC emissions from this emissions unit, in tons of VOC per month; and
  - d. the rolling, 12-month summation of the VOC emission rates.
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the 17.3 pounds of VOC per batch of waste material Applicable Emission Limitation;
    - ii. all exceedances of the rolling, 12-month VOC Applicable Emission Limitation; and
    - iii. all exceedances of the rolling, 12-month restriction on the amount of material shredded in this emissions unit.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).
- If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.
- (3) The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).



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 volatile organic compounds (VOC) shall not exceed 17.28 pounds per batch of waste materials.

Applicable Compliance Method:

The VOC emission limitation was determined by multiplying the facility provided emission factor of 0.3% VOC emitted by 5760 pounds of VOC containing material processed/batch = 17.28 pounds VOC per batch of waste materials.

b. Emission Limitation:

Emissions of VOC shall not exceed 35.94 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:

The annual emission limitation was determined by multiplying 17.28 pounds VOC/batch by the total number of batches processed then dividing by 2000 pounds.

c. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with US EPA Method 9.

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 a permittee to apply for and obtain a new or modified PTIO 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 PTIO.



**3. P004, Drum crushing operation**

**Operations, Property and/or Equipment Description:**

Drum Crusher with carbon adsorption,

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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)	Volatile Organic Compound (VOC) emissions shall not exceed 0.41 pounds per hour* and 0.86 tons per year.  *The lbs/hr emission limitation is based on the emission unit's potential to emit. Therefore, no hourly recordkeeping is required to demonstrate compliance.  See b)(2)(a) and c)(1)
b.	OAC rule 3745-21-07(M)	Exempt.

(2) Additional Terms and Conditions

a. This emission unit shall be equipped with a control system (i.e., capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least 95% cent, by weight. Currently the organic compound emissions are vented through a carbon absorption system.



- c) Operational Restrictions
  - (1) The hours of operation for this emission unit shall not exceed 16 hours per day and 4160 hours per year.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information:
    - a. the number of hours operated per day; and
    - b. the year-to-date total number of hours in operation.
  - (2) The permittee shall collect and record the following information on a weekly basis or at intervals no greater than 20% of the design carbon replacement interval, whichever is greater:
    - a. the VOC concentration from the carbon canister(s) outlet venting to the atmosphere (ie. outlet concentration);
    - b. the VOC concentration from the storage tank vent line prior to the carbon canister(s) (ie. inlet concentration);
    - c. the % overall organic compound control efficiency  $[1 - \frac{d(1)a}{d(1)b}] * 100$ ;
  - (3) Should the % overall organic compound control efficiency recorded in d)(2)c. be less than 95%, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
    - a. the date and time the deviation began;
    - b. the magnitude of the deviation at that time;
    - c. the date the investigation was conducted;
    - d. the name(s) of the personnel who conducted the investigation; and
    - e. the findings and recommendations.
  - (4) In response to each investigation required in d)(3) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit (95% control efficiency), unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:
    - a. a description of the corrective action;
    - b. the date corrective action was completed;



- c. the date and time the deviation ended;
- d. the total period of time during which there was a deviation;
- e. the control efficiency of the carbon canisters immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (5) As an alternative to conducting the monitoring specified in d)(2)-d(4), an owner or operator may replace the carbon in the carbon adsorption system with fresh carbon at a regular, predetermined time interval that is less than the carbon replacement interval that is determined at the maximum design flow rate and the maximum VOC concentration in the gas stream vented to the carbon adsorption system. Should the permittee choose this option the following information shall be maintained:
  - a. calculations determining the carbon replacement interval based on the maximum design flow rate and maximum VOC Concentration; and
  - b. the dates when the carbon in the carbon adsorption system was replaced.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Volatile Organic Compound (VOC) emissions shall not exceed 0.41 pounds per hour and 0.86 ton per year.

Applicable Compliance Method:

The lbs/hr of VOC emission limitation is based on the emission units potential to emit as calculated in PTI Application 14-5349.

Compliance with the hours of operation per year restriction in c)(1) ensures compliance with the corresponding TPY VOC emission limitations noted above  $((0.41 \text{ lbs/hr VOC} * 4160 \text{ hours per year})/2000) = 0.86 \text{ TPY VOC}$

b. Production Limitation:

16 hours of operation per day.

4160 hours of operation per year.

Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(1).

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in 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.



**4. P005, Transformer decommissioning**

**Operations, Property and/or Equipment Description:**

Transformer decommissioning

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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)	Volatile Organic Compound (VOC) emissions shall not exceed 1.8 pounds per hour based on a daily average.  See b)(2)a., b)(2)b., and c)(1).
b.	OAC rule 3745-21-07(M)	Exempt.

(2) **Additional Terms and Conditions**

a. The permittee shall employ submerged filling when adding solvent to the transformers.

b. The transformers shall be sealed during the 18-hour standing period after filling.



- c) Operational Restrictions
  - (1) The maximum number of transformers decommissioned shall not exceed the following:
    - a. 10 transformers per day; and
    - b. 2,500 transformers per year.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information on a daily basis on days when transformers are decommissioned:
    - a. the total number of transformers processed per day; and
    - b. the year-to-date total number of transformers decommissioned; and
    - c. a listing of all transformers decommissioned that did not comply with the requirements specified in b)(2)a. and b)(2)b. above.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- 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 Limitations:

VOC emissions shall not exceed 1.8 pounds per hour based on a daily average.

Applicable Compliance Method:

The VOC emission limitation was determined by multiplying the number of transformers decommissioned per day by the facility provided emission factor of 1.46 pounds of VOC per transformer and dividing by the number of hours worked per day ((1.46 lbs VOC/Transformer Decommissioned X 10 Transformers/Day)/8 hours per day=1.82 lbs VOC/hr).

Compliance with the production limitation of 10 transformers per day ensures compliance with the lbs of VOC per day emission limitation.

b. Production Limitation:

10 transformers per day and 2,500 transformers per year.

Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(1)a. and d)(1)b respectively.

c. Control requirements:

The permittee shall employ submerged filling when adding solvent to the transformers.

The transformers shall be sealed during the 18-hour standing period after filling.

Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(1)(c).

g) Miscellaneous Requirements

(1) None.



**5. P016, Fuel Dispersion**

**Operations, Property and/or Equipment Description:**

fuels dispersion unit and associated control equipment

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. g)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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)	Stack volatile organic compound (VOC) emissions shall not exceed 0.465 pounds per hour and 2.04 tons per year.  Stack hydrogen chloride (HCL) emissions shall not exceed 0.016 pound per hour and 0.07 ton per year.  Fugitive volatile organic compound (VOC) emissions shall not exceed 0.267 pounds per hour and 1.17 tons per year.  Fugitive hydrogen chloride (HCL) emissions shall not exceed 0.01 pound per hour and 0.04 ton per year.  See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-21-07(M)(1)&(2)	The control requirement specified by this rule is less stringent than the control requirement specified as BAT.

(2) Additional Terms and Conditions

a. The hourly and annual VOC and HCl emission limitations specified above are based upon the emissions unit's potential to emit while employing a carbon adsorption system with a control efficiency of 95% for VOC emissions and 95% for HCl emissions. Therefore, no hourly or annual records are required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

(1) The permittee shall operate and maintain a carbon adsorption system with a control efficiency of at least 95%, by weight, for the control of VOC emissions and control efficiency of at least 95%, by weight, for the control HCl emissions.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall monitor and record, at least once per week, the following information for this emissions unit:

- a. The inlet VOC/HCl emission concentrations flowing into the carbon adsorption system.
- b. The outlet VOC/HCl emission concentrations from the carbon adsorption system.
- c. The percent differential of the VOC/HCl emission concentrations between the inlet and outlet openings of the carbon adsorption system  $[(b)/(a) \times 100]$ .

(2) If the outlet concentration of VOC/HCl emissions is greater than 5% of the inlet VOC/HCl emission concentration (as calculated in Section d)(1)), then breakthrough of VOC/HCl emissions has occurred. If such breakthrough has occurred, the permittee shall perform one of the following options:

- a. Replace the carbon adsorption system (canisters) in order to maintain a control efficiency of at least 95%, by weight, for VOC and HCl emissions.
- b. Confirm breakthrough of the VOC/HCl emissions by calculating the percent differential of the VOC/HCl emissions using the methodology as specified in Section d)(1), once per hour, for three consecutive hours.

If breakthrough of VOC/HCl emissions has been confirmed (i.e., each of the three calculations performed in Section b)(2)b. indicate a greater than 5% differential of VOC/HCl emissions through the outlet), then the permittee shall replace the carbon adsorption system (canisters) in order to maintain a control efficiency of at least 95% by weight, for VOC and HCl emissions.



- (3) The permittee shall maintain monthly records that specify all times the carbon adsorption system (canisters) were replaced.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the emissions limitations in b) of these terms and conditions shall be determined in accordance with the following method(s) identified below:

a. Emission Limitation:

Stack VOC emissions shall not exceed 0.465 pound per hour and 2.04 TPY.

Applicable Compliance Method:

The hourly stack VOC emission limitation was calculated by using the emission factors, control efficiencies and the operational parameters as submitted in the confidential PTI application 14-05068 submitted on December 6, 2000.

The annual stack VOC emission limitation was established by multiplying the hourly VOC emission rate (0.465 pound per hour) x 8,760 hours per year and dividing by 2000.

b. Emission Limitation:

Fugitive VOC emissions shall not exceed 0.267 pound per hour and 1.17 TPY.



Applicable Compliance Method:

The hourly fugitive VOC emission limitation was calculated by using the emission factors, control efficiencies and the operational parameters as submitted in the confidential PTI application 14-05068 submitted on December 6, 2000.

The annual fugitive VOC emission limitation was established by multiplying the hourly VOC emission rate (0.267 pound per hour) x 8,760 hours per year and dividing by 2000.

c. Emission Limitation:

Stack HCl emissions shall not exceed 0.016 pound per hour and 0.07 TPY.

Applicable Compliance Method:

The hourly stack HCl emission limitation was calculated by using the emission factors, control efficiencies and the operational parameters as submitted in the confidential PTI application 14-05068 submitted on December 6, 2000.

The annual stack HCl emission limitation was established by multiplying the hourly HCl emission rate (0.016 pound per hour) x 8,760 hours per year and dividing by 2000.

d. Emission Limitation:

Fugitive HCl emissions shall not exceed 0.01 pound per hour and 0.04 TPY.

Applicable Compliance Method:

The hourly fugitive HCl emission limitation was calculated by using the emission factors, control efficiencies and the operational parameters as submitted in the confidential PTI application 14-05068 submitted on December 6, 2000.

The annual fugitive HCl emission limitation was established by multiplying the hourly HCl emission rate (0.01 pound per hour) x 8,760 hours per year and dividing by 2000.

- (2) Compliance with the operation restriction in c)(1) shall be demonstrated by the recordkeeping in d)(1), d)(2) and d)(3).

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in 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



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Spring Grove Resource Recovery Inc  
**Permit Number:** P0115864  
**Facility ID:** 1431072600  
**Effective Date:** 3/7/2014

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. Applicable Emissions Limitations and/or Control Requirements.



**6. P019, Vacuum truck operation**

**Operations, Property and/or Equipment Description:**

Vacuum truck operation for consolidation of organic materials

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(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. 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 3745-3-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 0.63 pound per hour and 2.76 tons per year.  See b)(2)a.
b.	OAC rule 3745-31-05(D) Synthetic Minor for Hazardous Air Pollutants (HAPs) to Avoid Title V operating permit.	See Section B.2.
c.	40 CFR Part 61, Subpart FF, Section 61.340	See Section B.6.

- (2) Additional Terms and Conditions
  - a. The hourly and annual VOC emission limitations specified above are based upon the emissions unit's potential to emit. Therefore, no hourly or annual records are required to demonstrate compliance with these emission limitations.



- c) Operational Restrictions
  - (1) See Section B.2. of this permit.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) See Section B.3. of this permit.
  - (2) The permit to install and operate (PTIO) for this emissions unit P019 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Benzene

TLV (ug/m3): 1,600

Maximum Hourly Emission Rate (lbs/hr): 0.12; 0.0148 gram/sec

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 34.77

MAGLC (ug/m3): 38.1

Pollutant: Vinyl Chloride

TLV (ug/m3): 2,560

Maximum Hourly Emission Rate (lbs/hr): 0.14; 0.0180 gram/sec

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 42.28

MAGLC (ug/m3): 61.0

Pollutant: Styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate (lbs/hr): 0.63

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 186.5

MAGLC (ug/m3): 2,029

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not



the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install and operate will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install and operate prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- \* This is the minimum TLV value for any contaminant that passes the toxic screening analysis. Prior to employing any material with a TLV less than this number, the permittee shall conduct an evaluation to determine if the new material will satisfy the "Air Toxics Policy."



e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (3) See Facility Wide Terms and Conditions Section B.4. of this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitation in b) of these terms and conditions shall be determined in accordance with the following method(s) identified below and in Section B.5. of this permit:

a. Emission Limitation:

VOC emissions shall not exceed 0.63 pound per hour and 2.76 TPY.

Applicable Compliance Method:

The hourly VOC emission limitation represents the emission unit's potential to emit and is based upon monitoring emissions from the exhaust of similar operations. The process monitored utilizes a pump to remove liquids/sludges from a rail car and transfers them to a transport trailer.

The following parameters were used in establishing the hourly VOC emission limitation:

Air Flow Measured: 350 cfm

Organic Concentration: 400 ppm



Air Density: 0.075 lb/cf

Air Mass Flow:  $350 \times 0.075 \text{ lb/cf} = 26.25 \text{ lb/minute} = 1,575 \text{ lb/hour}$

Emission Rate:  $400 \times 1,575/1,000,000 = 0.63 \text{ lb of VOC emissions /hour}$

The annual VOC emission limitation represents the emission unit's potential to emit and was established by multiplying the hourly VOC emission rate (0.63 lb/hour) by 8760 hours/year then dividing by 2000 lbs/ton.

- a) Miscellaneous Requirements
  - (1) None.



**7. T016, WWT tank TK 11 17,500 gallon**

**Operations, Property and/or Equipment Description:**

17,500 Gallon Fixed Roof Aqueous Waste/Wastewater Storage Tank w/ carbon absorption.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 0.33 tons per year*</p> <p>The TPY emission limitation is based on the emission units' potential to emit. Therefore no monitoring and record keeping is required to demonstrate compliance.</p> <p>See b)(2)a and b)(2)b.</p>
b.	OAC rule 3745-21-07(K)	Exempt.



- (2) Additional Terms and Conditions
  - a. This emissions unit shall be equipped with a submerged fill pipe. The submerged fill pipe shall be installed within six inches of the bottom of the tank.
  - b. The permittee shall operate and maintain a fixed-roof closed vent system that routes all organic vapors vented from the tank to a carbon adsorption system with a minimum control efficiency of 95% by weight.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information on a daily basis or at intervals no greater than 20% of the design carbon replacement interval, whichever is greater:
    - a. The VOC concentration from the carbon canister(s) outlet venting to the atmosphere (ie. outlet concentration);
    - b. The VOC concentration from the storage tank vent line prior to the carbon canister(s) (ie. inlet concentration);
    - c. The % overall organic compound control efficiency  $[1 - \frac{d(1)a}{d(1)b}] * 100$ ;
  - (2) Should the % overall organic compound control efficiency recorded in d)(1)c. be less than 95%, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
    - a. the date and time the deviation began;
    - b. the magnitude of the deviation at that time;
    - c. the date the investigation was conducted;
    - d. the name(s) of the personnel who conducted the investigation; and
    - e. the findings and recommendations.
  - (3) In response to each investigation required in d)(2) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit (95% control efficiency), unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:



- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time during which there was a deviation;
- e. the control efficiency of the carbon canisters immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) As an alternative to conducting the monitoring specified in d)(1)-d(3), an owner or operator may replace the carbon in the carbon adsorption system with fresh carbon at a regular, predetermined time interval that is less than the carbon replacement interval that is determined at the maximum design flow rate and the maximum VOC concentration in the gas stream vented to the carbon adsorption system. Should the permittee choose this option the following information shall be maintained:
  - a. calculations determining the carbon replacement interval based on the maximum design flow rate and maximum VOC Concentration; and
  - b. the dates when the carbon in the carbon adsorption system was replaced.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



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:

0.33 TPY VOC

Compliance Method:

The TPY VOC emission limitation was based on the emission units' potential to emit. The potential emissions were calculated using AP 42, Fifth Edition, Volume I Chapter 7: Liquid Storage Tanks and the minimum control efficiency of 95% for VOC emissions.

b. Control Measure:

The permittee shall operate and maintain a fixed-roof closed vent system that routes all organic vapors vented from the tank to a carbon adsorption system with a minimum control efficiency of 95% by weight.

Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(1)c.

g) Miscellaneous Requirements

(1) None.



8. Emissions Unit Group -10350 Gallon WWT Tanks: T012,T013,T014,T015,T017,

EU ID	Operations, Property and/or Equipment Description
T012	10,350 Gallon Fixed Roof Aqueous Waste/Wastewater Storage Tank w/ carbon absorption
T013	10,350 Gallon Fixed Roof Aqueous Waste/Wastewater Storage Tank w/ carbon absorption
T014	10,350 Gallon Fixed Roof Aqueous Waste/Wastewater Storage Tank w/ carbon absorption
T015	10,350 Gallon Fixed Roof Aqueous Waste/Wastewater Storage Tank w/ carbon absorption
T017	10,350 Gallon Fixed Roof Aqueous Waste/Wastewater Storage Tank w/ carbon absorption

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 0.20 tons per year*</p> <p>The TPY emission limitation is based on the emission units' potential to emit. Therefore no monitoring and record keeping is required to demonstrate compliance.</p> <p>See b)(2)a and b)(2)b.</p>
b.	OAC rule 3745-21-07(K)	Exempt.



- (2) Additional Terms and Conditions
  - a. This emissions unit shall be equipped with a submerged fill pipe. The submerged fill pipe shall be installed within six inches of the bottom of the tank.
  - b. The permittee shall operate and maintain a fixed-roof closed vent system that routes all organic vapors vented from the tank to a carbon adsorption system with a minimum control efficiency of 95% by weight.
- c) Operational Restrictions
  - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information on a daily basis or at intervals no greater than 20% of the design carbon replacement interval, whichever is greater:
    - a. The VOC concentration from the carbon canister(s) outlet venting to the atmosphere (ie. outlet concentration);
    - b. The VOC concentration from the storage tank vent line prior to the carbon canister(s) (ie. inlet concentration);
    - c. The % overall organic compound control efficiency  $[1 - \frac{d(1)a}{d(1)b}] * 100$ ;
  - (2) Should the % overall organic compound control efficiency recorded in d)(1)c. be less than 95%, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
    - a. the date and time the deviation began;
    - b. the magnitude of the deviation at that time;
    - c. the date the investigation was conducted;
    - d. the name(s) of the personnel who conducted the investigation; and
    - e. the findings and recommendations.
  - (3) In response to each investigation required in d)(2) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit (95% control efficiency), unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:



- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time during which there was a deviation;
- e. the control efficiency of the carbon canisters immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) As an alternative to conducting the monitoring specified in d)(1)-d(3), an owner or operator may replace the carbon in the carbon adsorption system with fresh carbon at a regular, predetermined time interval that is less than the carbon replacement interval that is determined at the maximum design flow rate and the maximum VOC concentration in the gas stream vented to the carbon adsorption system. Should the permittee choose this option the following information shall be maintained:
  - a. calculations determining the carbon replacement interval based on the maximum design flow rate and maximum VOC Concentration; and
  - b. the dates when the carbon in the carbon adsorption system was replaced.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



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:

0.20 TPY VOC

Compliance Method:

The TPY VOC emission limitation was based on the emission units' potential to emit. The potential emissions were calculated using AP 42, Fifth Edition, Volume I Chapter 7: Liquid Storage Tanks and the minimum control efficiency of 95% for VOC emissions.

b. Control Measure:

The permittee shall operate and maintain a fixed-roof closed vent system that routes all organic vapors vented from the tank to a carbon adsorption system with a minimum control efficiency of 95% by weight.

Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(1)c.

g) Miscellaneous Requirements

(1) None.



**9. Emissions Unit Group -15,000 Gallon F.R.S.T: T008,T009,T010,T011,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
T008	15,000 Gallon Fixed Roof Storage Tank w/ carbon absorption
T009	15,000 Gallon Fixed Roof Storage Tank w/ carbon absorption
T010	15,000 Gallon Fixed Roof Storage Tank w/ carbon absorption
T011	15,000 Gallon Fixed Roof Storage Tank w/ carbon absorption

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 0.70 tons per year*  The TPY emission limitation is based on the emission units' potential to emit. Therefore no monitoring and record keeping is required to demonstrate compliance.  See b)(2)a., b)(2)b., and c)(1).
b.	OAC rule 3745-21-07(M)(1)&(2).	The emission limitation established in this rule is less stringent than that established under OAC rule 3745-31-05(A)(3).



- (2) Additional Terms and Conditions
  - a. This emissions unit shall be equipped with a submerged fill pipe. The submerged fill pipe shall be installed within six inches of the bottom of the tank.
  - b. The permittee shall operate and maintain a fixed-roof closed vent system that routes all organic vapors vented from the tank to a carbon adsorption system with a minimum control efficiency of 95% by weight.
- c) Operational Restrictions
  - (1) The concentration of benzene in the material contained in this emissions unit shall not exceed two percent (2%) by weight.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information on a daily basis or at intervals no greater than 20% of the design carbon replacement interval, whichever is greater:
    - a. the VOC concentration from the carbon canister(s) outlet venting to the atmosphere (ie. outlet concentration);
    - b. the VOC concentration from the storage tank vent line prior to the carbon canister(s) (ie. inlet concentration);
    - c. the % overall organic compound control efficiency  $[1 - \frac{d(1)a}{d(1)b}] * 100$ ;
  - (2) Should the % overall organic compound control efficiency recorded in d)(1)c. be less than 95%, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
    - a. the date and time the deviation began;
    - b. the magnitude of the deviation at that time;
    - c. the date the investigation was conducted;
    - d. the name(s) of the personnel who conducted the investigation; and
    - e. the findings and recommendations.
  - (3) In response to each investigation required in d)(2) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit (95% control efficiency), unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:



- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time during which there was a deviation;
- e. the control efficiency of the carbon canisters immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) As an alternative to conducting the monitoring specified in d)(1)-d(3), an owner or operator may replace the carbon in the carbon adsorption system with fresh carbon at a regular, predetermined time interval that is less than the carbon replacement interval that is determined at the maximum design flow rate and the maximum VOC concentration in the gas stream vented to the carbon adsorption system. Should the permittee choose this option the following information shall be maintained:
  - a. calculations determining the carbon replacement interval based on the maximum design flow rate and maximum VOC Concentration; and
  - b. the dates when the carbon in the carbon adsorption system was replaced.
- (5) The permittee shall maintain records of the concentration of benzene, in percent by weight, of each liquid material stored in this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is



considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:

0.70 TPY VOC

Compliance Method:

The TPY VOC emission limitation was based on the emission units' potential to emit. The potential emissions were calculated using AP 42, Fifth Edition, Volume I Chapter 7: Liquid Storage Tanks and the minimum control efficiency of 95% for VOC emissions.

b. Control Measure:

The permittee shall operate and maintain a fixed-roof closed vent system that routes all organic vapors vented from the tank to a carbon adsorption system with a minimum control efficiency of 95% by weight.

Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(1)c.

c. Control Measure:

The concentration of benzene in the material contained in this emissions unit shall not exceed two percent (2%) by weight.

Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(5).

g) Miscellaneous Requirements

(1) None.



**10. Emissions Unit Group -7000 Gallon F.R.S.T: T005,T006,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
T005	7000 Gallon Fixed Roof Storage Tank w/ carbon absorption
T006	7000 Gallon Fixed Roof Storage Tank w/ carbon absorption

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

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)	There were no emission limitations established under PTI 14-0415.  See b)(2)a and b)(2)b.

(2) Additional Terms and Conditions

a. This emissions unit shall be equipped with a submerged fill pipe. The submerged fill pipe shall be installed within six inches of the bottom of the tank.

b. The permittee shall operate and maintain a fixed-roof closed vent system that routes all organic vapors vented from the tank to a carbon adsorption system with a minimum control efficiency of 95% by weight.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information on a daily basis or at intervals no greater than 20% of the design carbon replacement interval, whichever is greater:
  - a. the VOC concentration from the carbon canister(s) outlet venting to the atmosphere (ie. outlet concentration);
  - b. the VOC concentration from the storage tank vent line prior to the carbon canister(s) (ie. inlet concentration);
  - c. the % overall organic compound control efficiency  $[1 - \frac{d(1)a}{d(1)b}] * 100$ ;
- (2) Should the % overall organic compound control efficiency recorded in d)(1)c. be less than 95%, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
  - a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;
  - c. the date the investigation was conducted;
  - d. the name(s) of the personnel who conducted the investigation; and
  - e. the findings and recommendations.
- (3) In response to each investigation required in d)(2) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit (95% control efficiency), unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:
  - a. a description of the corrective action;
  - b. the date corrective action was completed;
  - c. the date and time the deviation ended;
  - d. the total period of time during which there was a deviation;
  - e. the control efficiency of the carbon canisters immediately after the corrective action was implemented; and
  - f. the name(s) of the personnel who performed the work.



Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (4) As an alternative to conducting the monitoring specified in d)(1)-d(3), an owner or operator may replace the carbon in the carbon adsorption system with fresh carbon at a regular, predetermined time interval that is less than the carbon replacement interval that is determined at the maximum design flow rate and the maximum VOC concentration in the gas stream vented to the carbon adsorption system. Should the permittee choose this option the following information shall be maintained:
  - a. calculations determining the carbon replacement interval based on the maximum design flow rate and maximum VOC Concentration; and
  - b. the dates when the carbon in the carbon adsorption system was replaced.
- e) Reporting Requirements
  - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
  - (2) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- 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. Control Measure:

The permittee shall operate and maintain a fixed-roof closed vent system that routes all organic vapors vented from the tank to a carbon adsorption system with a minimum control efficiency of 95% by weight.



**Final Permit-to-Install and Operate**  
Spring Grove Resource Recovery Inc  
**Permit Number:** P0115864  
**Facility ID:** 1431072600  
**Effective Date:** 3/7/2014

Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(1)c.

- g) Miscellaneous Requirements
  - (1) None.