



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

1/28/2015

Steve Pantano
Stericycle Inc
1901 Pine Ave Se
Warren, OH 44483

Certified Mail

Facility ID: 0278080634
Permit Number: P0115341
County: Trumbull

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 12/17/2014. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Northeast District Office



Response to Comments

Facility ID:	0278080634
Facility Name:	StericycleInc
Facility Description:	
Facility Address:	1901 Pine Avenue SE Warren, OH 44483 Trumbull County
Permit:	P0115341, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Warren Tribune Chronicle on 12/19/2014. The comment period ended on 01/18/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: None

- a. Comment: None
- b. Response: None



PRELIMINARY PROPOSED

Division of Air Pollution Control Title V Permit for Stericycle Inc

Facility ID:	0278080634
Permit Number:	P0115341
Permit Type:	Renewal
Issued:	1/28/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Stericycle Inc

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Authorization

Facility ID: 0278080634
Facility Description:
Application Number(s): A0048105
Permit Number: P0115341
Permit Description: Title V renewal permit for hospital, medical, and infectious waste incinerator (HMIWI).
Permit Type: Renewal
Issue Date: 1/28/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0086292

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

StericycleInc
1901 Pine Avenue SE
Warren, OH 44483

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Preliminary Proposed Title V Permit

Stericycle Inc

Permit Number: P0115341

Facility ID: 0278080634

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenance requests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))



4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.



- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))



10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

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

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.



- b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))



16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

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

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine



whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



30. Submitting Documents Required by this Permit

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 Ohio EPA DAPC, Northeast District Office, 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 Responsible Official may be represented as provided through procedures established in Air Services.



Preliminary Proposed Title V Permit

Stericycle Inc

Permit Number: P0115341

Facility ID: 0278080634

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Preliminary Proposed Title V Permit

Stericycle Inc

Permit Number: P0115341

Facility ID: 0278080634

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following insignificant emissions unit is located at this facility:
 - a) B001 - Natural Gas Fired Boiler, 150 HP

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

(Authority for term: OAC rule 3745-77-07(A)(13))



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C. Emissions Unit Terms and Conditions



1. N001, Incinerator equipped with a wet scrubber

Operations, Property and/or Equipment Description:

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. b)(1)a.

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.	40 CFR Part 62, Subpart HHH (This rule is applicable until OAC rule 3745-75 is revised to include the associated emission limitations, monitoring, record keeping, reporting and performance testing requirements)	<p>Particulate emissions (PE) shall not exceed 25 mg PE/dscm (0.011 grain PE/dscf) of exhaust gases.</p> <p>Carbon monoxide (CO) emissions shall not exceed 11 parts per million (ppm) by volume as a 12-hour rolling average, calculated as specified in EPA Reference Method 19.</p> <p>Dioxins/furans (D/F) emissions shall not exceed 9.3 ng/dscm (4.1 grains/billion dscf) of total dioxins/furans or 0.054 ng/dscm (0.024 grain/billion dscf) expressed as Toxic Equivalency Factors (TEQ).</p> <p>Hydrogen chloride (HCl) emissions shall not exceed 6.6 ppm by volume.</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Sulfur dioxide (SO₂) emissions shall not exceed 9.0 ppm by volume.</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 140 ppm by volume.</p> <p>Lead (Pb) and Pb compound emissions shall not exceed 0.036 mg/dscm (0.016 gr/1000 dscf).</p> <p>Cadmium (Cd) and Cd compound emissions shall not exceed 0.0092 mg/dscm (0.0040 gr/1000 dscf).</p> <p>Mercury (Hg) and Hg compound emissions shall not exceed 0.018 mg/dscm (0.0079 gr/1000 dscf).</p> <p>(all units corrected to 7% oxygen, dry basis at standard conditions)</p> <p>[Table 1B to Subpart Ce of Part 60 – Emissions Limits for Small, Medium, and Large HMIWI at Affected Facilities as Defined in § 60.32e(a)(1) and (a)(2).]</p> <p>Visible emissions of combustion ash from an ash conveying system shall not be discharged in excess of 5 percent of the observation period pursuant to 40 CFR §62.14412(b).</p> <p>The stack opacity emission limitation required by this applicable rule in 40 CFR 62.14412(a) is less stringent than the stack opacity emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>
b.	OAC rule 3745-75-02	<p>Arsenic (As) and As compound emissions shall not exceed 0.21 mg/dscm (0.092 gr/1000 dscf).</p> <p>Beryllium (Be) and Be compound emissions shall not exceed 0.026 mg/dscm (0.011 gr/1000 dscf).</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Chromium (Cr) and Cr compound emissions shall not exceed 0.075 mg/dscm (0.033 gr/1000 dscf).</p> <p>Nickel (Ni) and Ni compound emissions shall not exceed 0.65 mg/dscm (0.284 gr/1000 dscf).</p> <p>(all units corrected to 7% oxygen, dry basis at standard conditions)</p>
c.	OAC rule 3745-75-02(K)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
d.	OAC rule 3745-17-07	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
e.	OAC rule 3745-17-09	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-75-02.
f.	OAC rule 3745-31-05(A)(3) (PTI 02-3436)	<p>The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-75-02 and Table 1B of 40 CFR Part 62, Subpart HHH.</p> <p>There shall be no visible emissions from the exhaust stack serving this emissions unit.</p>

(2) Additional Terms and Conditions

- a. The emissions from the large hospital/medical/infectious waste incinerator's (HMIWI) exhaust stack shall not exceed the following limitations: Compliance with emission limits for pollutants without CEMS are determined through the monitoring of operating parameters (measured as 3-hour rolling averages). Any pollutant being monitored by a CEM, installed and maintained in accordance with the applicable procedures under Appendices B and F of 40 CFR Part 60, shall be calculated as 12-hour averages (not including startup and shutdown).



The emission limitations established pursuant to OAC 3745-75-02 and 40 CFR Part 62, Subpart HHH shall apply at all times except during periods of startup, shutdown, or malfunction, provided that no hospital waste or medical/infectious waste is charged to the HMIWI during periods of startup, shutdown, or malfunction.

[Authority for term: OAC rule 3745-75-02(A) through (K) and 40 CFR Part 62, Subpart HHH, Table 1]

c) Operational Restrictions

- (1) The waste material feed rate to this incinerator shall be limited to 1350 pounds per hour (or a rate established during either the initial performance testing or most recent performance test as petitioned by the permittee), measured as 3-hour rolling averages.

[Authority for term: OAC rule 3745-75-01(B) and OAC rule 3745-31-05]

- (2) All incineration shall occur in a controlled air, multi-chamber incinerator, or equivalent technology as approved by the Director, which provides complete combustion of waste, excluding non-combustible items, to carbonized or mineralized ash. Any ash that does not meet this criterion shall be reincinerated.

[Authority for term: OAC rule 3745-75-03]

- (3) The primary combustion chamber for this incinerator shall be maintained so that the exit gas is at a minimum temperature of 1400 degrees Fahrenheit. The secondary combustion chamber for this incinerator shall operate so that the temperature of the gas exiting the chamber is a minimum of 90% of the highest 3-hour average secondary chamber temperature (taken, at a minimum, once every minute) measured during the initial performance test or the most recent performance test as petitioned by the permittee, demonstrating compliance with the PE, CO, and D/F limits, or a minimum temperature of 1800 degrees Fahrenheit, whichever is greater.

[Authority for term: OAC rule 3745-75-03 and OAC rule 3745-31-05]

- (4) The secondary combustion chamber of this incinerator shall allow for a 2-second retention time at 1800 degrees Fahrenheit.

[Authority for term: OAC rule 3745-75-03(D) and OAC rule 3745-31-05]

- (5) This incinerator shall be equipped with an automatic feeder which is designed and operated so that wastes cannot be charged if the temperature of the gas exiting the secondary combustion chamber has not reached the minimum temperature established in c)(3).

[Authority for term: OAC rule 3745-75-03]

- (6) Infectious waste shall not be loaded into the primary combustion chamber of this incinerator until the exit gas temperature has reached 1400 degrees Fahrenheit.

[Authority for term: OAC rule 3745-75-03]



- (7) The stack(s) for this incinerator shall be designed to minimize the impact of the emissions on employees, residents, visitors, and nearby residences. The design shall meet good engineering practices so as not to cause concentrations of any air contaminant at any air intake for heating and cooling of any building or at operable windows or doors.

[Authority for term: OAC rule 3745-75-03]

- (8) If this incinerator is mechanically-fed, it must be equipped with an air lock system to prevent opening the incinerator to the room environment. The volume of the loading system shall be designed so as to prevent the overcharging of the unit to ensure complete combustion of the waste.

[Authority for term: OAC rule 3745-75-03]

- (9) This incinerator shall be equipped with an air pollution control system designed to reduce HCl emissions, D/F emissions, and Hg emissions and provide for continuous compliance with the HCl, D/F, and Hg emission limits when the unit is in operation.

[Authority for term: OAC rule 3745-75-03 and OAC rule 3745-31-05]

- (10) The permittee shall maintain the air pollution control system to aid in the control of D/F, Hg, and HCl. The applicable parameters required to be monitored under OAC rule 3745-75-04 shall be maintained at or above minimum levels and below maximum levels established during either the initial performance testing or most recent performance test as petitioned by the permittee.

[Authority for term: OAC rule 3745-75-04]

- (11) This incinerator, including all associated equipment and grounds, shall be designed, operated and maintained to prevent the emission of objectionable odors.

[Authority for term: OAC rule 3745-75-03(K)]

- (12) Under no circumstances shall radiological or radioactive waste be charged into this unit.

Medical/infectious waste that is also radioactive shall be managed in accordance with the applicable rules of the Ohio department of health and regulations of the United States nuclear regulatory commission.

[Authority for term: OAC rule 3745-75-03(L) and ORC 3743.027]

- (13) The permittee shall not intentionally dispose of the following items by charging and burning them in the HMIWI:

- a. visible globules of mercury;
- b. nickel-cadmium batteries;



- c. switches, thermometers, batteries, and other devices containing mercury; and
- d. cadmium, chromium, or lead as a pigmenting agent.

[Authority for term: OAC 3745-75-03(M)]

- (14) This incinerator shall be operated only by properly trained personnel. A minimum of twenty four hours of incinerator operation training shall be provided to each operator before he or she is allowed to operate this incinerator. This may include, for each operator, the successful completion of the training course for the operation and maintenance of hospital medical waste incinerators developed by the Control Technology Center, U.S. EPA, courses or instructions provided by incinerator manufacturers, professional engineering organizations, colleges or universities, corporate training programs, or the Ohio EPA. A copy of all the training records for each operator shall be maintained on file and shall be immediately available to the Director (the Ohio EPA Northeast District Office) and U.S.EPA upon request. An annual review or refresher course of at least 4 hours must be conducted annually in order to maintain their qualifications to operate the HMIWI.

[Authority for term: OAC rule 3745-75-03]

- (15) This facility may not receive or incinerate any hazardous waste materials as defined in 40 CFR Part 216, Subpart D.

[Authority for term: OAC rule 3745-31-05]

- (16) The permittee shall have this incinerator inspected monthly using preventive maintenance procedures recommended by the equipment manufacturer. Each inspection shall include a written report identifying any needed repairs to the unit. If repairs are needed, the incinerator shall not be operated if the operation would result in any exceedance of the emission limits detailed in this permit. These repairs shall be completed within 30 days of the inspection. If a time period longer than 30 days is needed to complete the repairs, the Ohio EPA Northeast District Office shall be notified in writing. This notice shall list the repairs needed and the reason(s) the repairs could not be accomplished within the required time period. All inspection and repair reports shall be kept by the permittee for a period of 5 years and shall be made available to the Director (the Ohio EPA Northeast District Office) upon request.

[Authority for term: OAC rule 3745-77-07(A)(1)]

- (17) The permittee is required to have a fully trained and qualified HMIWI operator, either at the facility or on-call. A trained and qualified HMIWI operator is defined in OAC rule 3745-75-03.

[Authority for term: OAC rule 3745-75-03]

- (18) The permittee is required to maintain a site-specific HMIWI operating procedure, as required by OAC rule 3745-75-03(T), and to review this operating information annually.

[Authority for term: OAC rule 3745-75-03(T)]



- (19) The permittee is required to have a waste management plan, as required by OAC rule 3745-75-05(F).

[Authority for term: OAC rule 3745-75-05 and OAC rule 3745-77-01(A)(1)]

- (20) During either the initial performance testing or most recent performance test as petitioned by the permittee, the permittee shall establish minimum (3-hour rolling average) operating parameter restrictions for:

- a. liquid flow rate to the wet scrubber with venturi inlet;
- b. pressure drop across the wet scrubber with venturi; and
- c. the pH at the inlet to the wet scrubber with venturi.

[Authority for term: OAC rule 3745-75-01(B) and OAC rule 3745-75-03(I)]

- (21) During either the initial performance testing or most recent performance test as petitioned by the permittee, the permittee shall establish the maximum (3-hour rolling average) operating parameter restriction for the temperature at the outlet from the wet scrubber with venturi (maximum flue gas temperature).

[Authority for term: OAC rule 3745-75-01(B) and OAC rule 3745-75-03(I)]

- (22) Except during startup or shutdown (where no hospital, medical, and/or infectious wastes have been charged or the charged material has been completely incinerated) or malfunctions, use of the bypass stack to the HMIWI shall constitute a violation of the PE, D/F, HCl, Pb, Cd and Hg emission limitations.

[Authority for term: OAC rule 3745-75-02(L)]

- (23) Operating the HMIWI, equipped with a wet scrubber with venturi, above the maximum charge rate, below the minimum secondary chamber temperature, and below the minimum scrubber liquor flow rate (each measured on a 3-hour rolling average) simultaneously shall constitute a violation of the D/F emission limitation.

[Authority for term: OAC rule 3745-75-02(O)]

- (24) Operating the HMIWI, equipped with a wet scrubber with venturi, above the maximum charge rate and above the maximum flue gas temperature (each measured on a 3-hour rolling average) simultaneously shall constitute a violation of the Hg emission limitation.

[Authority for term: OAC rule 3745-75-02(Q)]

- (25) Operating the HMIWI, equipped with a wet scrubber with venturi, above the maximum charge rate and below the minimum absorber scrubber liquor pH (each measured on a 3-hour rolling average) simultaneously shall constitute a violation of the HCl emission limitation.

[Authority for term: OAC rule 3745-75-02(R)]



- (26) Operating the HMIWI, equipped with a wet scrubber with venturi, above the maximum charge rate and below the minimum pressure drop across the wet scrubber with venturi (each measured on a 3-hour rolling average) simultaneously shall constitute a violation of the particulate matter emission limitation.

[Authority for term: OAC rule 3745-75-02(T)]

- (27) The HMIWI shall not be operated at any time above any of the applicable maximum operating parameters or below any of the applicable minimum operating parameters, measured as 3-hour rolling averages, except during periods of startup, shutdown, and malfunction. Operating parameter limits do not apply during the performance testing. Operating above the established maximum or below the established minimum operating parameters shall constitute a violation of established operating parameters.

[Authority for term: OAC rule 3745-75-02(I)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the primary combustion exhaust gas temperature, the secondary combustion exhaust gas temperature, and the bypass stack temperature when the incinerator is in operation. Units shall be in degrees Fahrenheit. Accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be within 0.75 percent of the temperature being measured or 2.5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-75-04(A), 3745-75-04(D) and 3745-75-04(H)]

- (2) The permittee shall operate and maintain continuous monitors and recorders that measure and record the 3-hour average value, each minute when the incinerator is in operation, for the following parameters:

- a. liquid flow rate to the wet scrubber with venturi inlet;
- b. pressure drop across the wet scrubber with venturi;
- c. temperature at the outlet from the wet scrubber with venturi; and
- d. the pH at the inlet to the wet scrubber with venturi.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-75-04(H) and 3745-75-04(K)]

- (3) Radioactive waste shall not be charged to this incinerator. The permittee shall operate and maintain equipment to continuously monitor the radioactivity of all waste prior to combustion. This monitor shall be equipped with an alarm which sounds a warning when radioactive waste is present. For purposes of this permit, radioactive waste shall be defined as any waste which measures above ambient background levels of radiation. All radioactive infectious waste shall be managed in accordance with the applicable rules of



the Ohio Department of Health and the regulations of the United States Nuclear Regulatory Commission.

[Authority for term: OAC rule 3745-75-04(C) and OAC rule 3745-77-07(C)(1)]

- (4) A scale (accurate to within one pound) shall be installed near this incinerator to weigh all of the material charged to the unit. A record of the amount of material charged to this unit, on a pounds per 3-hour rolling average basis, shall be maintained. (Alternative arrangements may be approved by the Director provided they can be shown to be of equivalent effectiveness as a method of regulating flow into the incinerator and generating a permanent record of charging rates.)

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-75-04(E), 3745-75-04(H) and 3745-75-04(K)]

- (5) A logbook shall be maintained for each continuous emissions monitoring system installed on this incinerator to document all activities involving the monitoring systems. Appropriate records should include, as a minimum, preventive maintenance, quality assurance and corrective action activities.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The HMIWI, having a capacity greater than 1,000 pounds per hour shall be equipped with a continuous carbon monoxide monitor and alarm. The alarm shall sound whenever concentrations exceed 150 ppm as an instantaneous measurement. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60, Section 60.13 and Appendix B, Performance Specification 4 and shall be maintained and operated in accordance with 40 CFR Part 60, Appendix F. The permittee shall document all instances of carbon monoxide values in excess of the limitations specified in OAC rule 3745-75-02 or any limitations specified in the terms and conditions of this permit.

[Authority for term: OAC rules 3745-77-07(C)(1) and OAC 3745-75-04(B)]

- (7) The HMIWI, having a capacity greater than 1,000 pounds per hour shall be equipped with a continuous opacity monitor unless exempted by the director because of the influence of condensed water vapor in the stack exit gas. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60, Section 60.13 and Appendix B, Performance Specification 1. The permittee shall document all instances of opacity in excess of the limitations specified in OAC rule 3745-75-02(K) or any limitations specified in the terms and conditions of this permit.

[Authority for term: OAC 3745-75-04(F) and (G)]

- (8) Prior to burning any infectious waste in this incinerator, the permittee shall install, operate and maintain equipment to continuously monitor and record the CO emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60, section 60.13 and Appendix B, Performance Specification 4 and OAC rule 3745-75-04. The permittee shall maintain and operate the CO continuous emissions monitoring (CEM) system in accordance with



40 CFR Part 60, Appendix F. Any new CEM system for CO shall be designed so that the requirements in 40 CFR Part 60, Appendix F can be achieved.

The permittee shall operate a CEM system to measure oxygen concentrations, for adjusting pollutant concentrations to 7 percent oxygen.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-75-04(B) and 3745-75-04(G)]

- (9) The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of all data obtained by the continuous CO monitoring system including, but not limited to:

- a. emissions of CO in units of the applicable standard(s) in the appropriate averaging period;
- b. results of cylinder gas audits;
- c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- d. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- e. hours of operation of the emissions unit, continuous CO monitoring system, and control equipment;
- f. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous CO monitoring system;
- g. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous CO monitoring system; and
- h. the reason (if known) and the corrective actions taken (if any) for each such event in (f) and (g).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

[Authority for term: 40 CFR 60.13] and [40 CFR Part 60, Appendices B & F]

- (10) The permittee shall document all instances of CO values in excess of the limitations specified in the terms and conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]



- (11) The certified CEM system for CO shall be the means by which compliance with the terms and conditions of this permit is determined. Compliance with the appropriate emission limitation shall be based upon 12-hour, rolling averages, calculated each hour as the average of the previous 12 operating hours (not including start-up, shutdown, or malfunctions.)

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (12) The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

[Authority for term: 40 CFR 63.2 and Appendix F to 40 CFR Part 60]

- (13) The permittee shall maintain a written quality assurance/quality control plan for the continuous CO monitoring system, designed to ensure continuous valid and representative readings of CO emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

[Authority for term: 40 CFR 60.13 and 40 CFR Part 60, Appendix F]

- (14) The permittee shall maintain the following:
- a. the names of HMIWI operators who have completed review of the documentation in OAC rule 3745-75-03 as required by OAC rule 3745-75-03, including the date of the initial and all subsequent annual reviews;
 - b. the names of HMIWI operators who have completed the operator training requirements, including documentation of training and the dates of the training;
 - c. the names of HMIWI operators who have met the criteria for qualification under OAC rule 3745-75-03 and the dates of their qualification; and
 - d. records of calibration of any monitoring devices as required under OAC rule 3745-75-04.

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-75-03 and 3745-75-04]



- (15) The permittee shall obtain monitoring data at all times during HMIWI operation except during periods of monitoring equipment malfunction, calibration, or repair. At a minimum, valid monitoring data shall be obtained and recorded for 75% of the operating hours per day and for 90% of the operating days per calendar quarter that the affected facility combusts hospital waste and/or medical/infectious waste.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-75-04(L)]

e) Reporting Requirements

- (1) The permittee shall submit annual reports, by January 31 of each year, that provide the total amount of waste incinerated, in tons, during the previous calendar year.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (2) The permittee also shall submit quarterly deviation (excursion) reports that identify all periods of operation during which the average charge rate exceeded the limitation specified in c)(1) above, including the actual charge rates for all such periods of operation. The quarterly deviation reports shall be submitted in accordance with Standard Term and Condition A.2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that provide the following information for each period during which the primary or secondary combustion chamber exhaust gas temperature falls below the applicable limitation during normal operation:

- a. the date of the excursion;
- b. the time interval over which the excursion occurred;
- c. the temperature values during the excursion;
- d. the cause(s) for the excursion; and
- e. the corrective action which has been or will be taken to prevent similar excursions in the future.

The quarterly deviation reports shall be submitted in accordance with Standard Term and Condition A.2.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-75-05]

- (4) Pursuant to 40 CFR Part 60, section 60.7 and 60.13(h), 40 CFR Part 60, Appendix F and OAC rule 3745-75-05, the permittee shall submit quarterly reports that document all instances of CO values in excess of the limitations specified in the terms and conditions



of this permit. The permittee shall submit data assessment reports in accordance with 40 CFR Part 60, Appendix F. The quarterly deviation reports shall be submitted in accordance with Standard Term and Condition A.2.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-75-05]

- (5) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of CO emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous CO and other associated monitors;
 - iii. continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total CO emissions for the calendar quarter (tons);
 - vi. the total operating time (hours) of the emissions unit;
 - vii. the total operating time of the continuous CO monitoring system while the emissions unit was in operation;
 - viii. results and dates of cylinder gas audits;
 - ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));



- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction** of the continuous CO monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous CO monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit

[Authority for term: 40 CFR 60.7]

- (6) A comprehensive written report on the results of any emission test(s) shall be submitted within 90 days following completion of the test(s).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-75-05]

- (7) The permittee shall submit quarterly deviation (excursion) reports identifying the following information:
 - a. the identification of calendar days during which required data on emission rates or the operating parameters were not obtained, to include an identification of the emission rate(s) or operating parameter(s) not measured, the reason(s) for not obtaining the data, and a description of the corrective action(s) taken to prevent a reoccurrence;
 - b. the identification of calendar days during which there was a malfunction of the HMIWI or its control equipment, a description of the malfunction, the time and duration of the malfunction, the corrective action(s) taken, and any measure(s) implemented to prevent a reoccurrence; and
 - c. the identification of calendar days during which any emission rate or operating parameter exceeded the applicable limits, with a description of the exceedance(s), reason(s) for such exceedance(s), a description of the corrective action(s) taken, and any measure(s) implemented to prevent a reoccurrence.



These reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall cover the data obtained during the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-75-05(B)]

- (8) The permittee shall submit semiannual reports for the HMIWI containing the information specified below:
- a. the values for the site-specific operating parameters established during either the initial performance testing or most recent performance test as petitioned by the permittee, demonstrating the HMIWI was in compliance;
 - b. the highest maximum operating parameters for the material charge rate and temperature at the outlet from the wet scrubber with venturi (scrubber flue gas temperature); and the lowest minimum operating parameters for the HMIWI secondary chamber temperature, the pressure drop across the wet scrubber with venturi, and the flow rate of the wet scrubber with venturi and pH of the absorber scrubber liquor recorded for the 6-month period being reported;
 - c. the highest maximum operating parameters for the material charge rate and temperature at the outlet from the wet scrubber with venturi (scrubber flue gas temperature); and the lowest minimum operating parameters for the HMIWI secondary chamber temperature, the pressure drop across the wet scrubber with venturi, and the flow rate of the wet scrubber with venturi and pH of the absorber scrubber liquor recorded during the preceding three semiannual reporting periods, in order to provide the Director (Ohio EPA Northeast District Office) with a summary of the performance of the HMIWI over a 2-year period;
 - d. the identification of calendar days during the preceding 6-month reporting period during which required data on emission rates or the operating parameters were not obtained, to include an identification of the emission rates or operating parameters not measured, the reason(s) for not obtaining the data, and a description of the corrective action(s) taken to prevent a recurrence;
 - e. the identification of calendar days during the preceding 6-month reporting period for which there was a malfunction of the HMIWI or its control equipment, a description of the malfunction, the time and duration of the malfunction, and the corrective action(s) taken to correct it;
 - f. the identification of calendar days during the preceding 6-month reporting period for which any emission rate or operating parameter exceeded the applicable limits, with a description of the exceedances, reasons for such exceedances, and a description of the corrective action(s) taken;
 - g. if a performance test was conducted during the reporting period, the results of that test;
 - h. if no exceedances of the emission limits or the operating parameters or no malfunctions of the HMIWI or control equipment were recorded for the



semiannual reporting period, a statement that no exceedances occurred during the reporting period;

- i. the date, time, and duration of any use of the bypass stack; the reason for the malfunction, and the corrective action(s) taken; and
- j. any activation of the radioactivity alarm, the reason for the alarm, and the corrective action(s) taken.

The semiannual reports shall be submitted no more than 6 months following the previous report and all reports shall be signed by the facility manager.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-75-05(A)]

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:

PE shall not exceed 25 mg PE/dscm (0.011 grain PE/dscf) of exhaust gases, corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 5 or Method 29, or by an alternative method approved by the Ohio EPA.

- b. Emission Limitation:

CO emissions shall not exceed 11 ppm by volume as a 12-hour rolling average, calculated as specified in EPA Reference Method 19, corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

Compliance shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 10 or 10B, or by an alternative method approved by the Ohio EPA.

[Authority for term: 40 CFR 60.13 and 40 CFR Part 60, Appendices B & F]



c. Emission Limitation:

D/F emissions shall not exceed 9.3 ng/dscm (4.1 grains/billion dscf) of total D/F or 0.054 ng/dscm (0.024 grain/billion dscf) expressed as TEQ, corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 23, or by an alternative method approved by the Ohio EPA.

d. Emission Limitation:

HCl emissions shall not exceed 6.6 ppm by volume, corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 26 or 26A, or by an alternative method approved by the Ohio EPA.

e. Emission Limitation:

SO₂ emissions shall not exceed 9.0 ppm by volume, corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 6, or by an alternative method approved by the Ohio EPA.

f. Emission Limitation:

NO_x emissions shall not exceed 140 ppm by volume, corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 7 or 7E, or by an alternative method approved by the Ohio EPA.

g. Emission Limitation:

Pb and Pb compound emissions shall not exceed 0.036 mg/dscm (0.016 gr/1000 dscf), corrected to 7% oxygen on a dry basis at standard conditions.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29, or by an alternative method approved by the Ohio EPA.

h. Emission Limitation:

Cd and Cd compound emissions shall not exceed 0.0092 mg/dscm (0.0040 gr/1000 dscf), corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29, or by an alternative method approved by the Ohio EPA.

i. Emission Limitation:

Hg and Hg compound emissions shall not exceed 0.018 mg/dscm (0.0079 gr/1000 dscf), corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29, or by an alternative method approved by the Ohio EPA.

j. Emission Limitation:

As and As compound emissions shall not exceed 0.21 mg/dscm (0.092 gr/1000 dscf), corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29, or by an alternative method approved by the Ohio EPA.

k. Emission Limitation:

Be and Be compound emissions shall not exceed 0.026 mg/dscm (0.011 gr/1000 dscf), corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29, or by an alternative method approved by the Ohio EPA.



I. Emission Limitation:

Cr and Cr compound emissions shall not exceed 0.075 mg/dscm (0.033 gr/1000 dscf), corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29, or by an alternative method approved by the Ohio EPA.

m. Emission Limitation:

Ni and Ni compound emissions shall not exceed 0.65 mg/dscm (0.284 gr/1000 dscf), corrected to 7% oxygen on a dry basis at standard conditions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29, or by an alternative method approved by the Ohio EPA.

n. Emission Limitation:

Visible emissions of combustion ash from an ash conveying system shall not be discharged in excess of 5 percent of the observation period pursuant to 40 CFR §62.14412(b).

Applicable Compliance Method:

If required, compliance with the opacity standard shall be demonstrated through the use of EPA Reference Method 22 of 40 CFR Part 60, Appendix A-7 to measure fugitive opacity pursuant to 40 CFR §62.14412(b).

o. Emission Limitation:

There shall be no visible emissions from the exhaust stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance with the opacity standard shall be demonstrated through the use of EPA Reference Method 9 of 40 CFR Part 60, Appendix A-4 to measure stack opacity pursuant to 40 CFR §62.14452(i).

[Authority for term: OAC rules 3745-77-07(C)(1), 3745-75-06, and 3745-15-04]



- (2) The permittee shall conduct, or have conducted, periodic emission testing for this emissions unit in accordance with the following requirements:
- a. The permittee must conduct an initial performance test for PM, opacity, CO, dioxin/furan, HCl, Pb, Cd, Hg, SO₂, NO_x and fugitive ash emissions using the test methods and procedures outlined in 40 CFR Part 62.14452.
 - b. The permittee must conduct the initial performance test within 180 days after the final compliance date of May 13, 2014 per 40 CFR Part 62.14470(a)(2).
 - c. The tests for opacity, PE, CO and HCl shall be conducted annually (no more than 12 months following the previous performance test) using the applicable procedures and test methods listed in this permit. If all three performance tests over a three year period indicate compliance with the emission limit for PE, CO and HCl, the owner or operator may forego a performance test for that pollutant for the subsequent two years. At a minimum, a performance test for PE, CO and HCl shall be conducted every third year (no more than 36 months following the previous performance test). If a performance test conducted every third year indicates compliance with the emission limit for a pollutant (PE, CO and HCl), the owner or operator may forego a performance test for that pollutant for an additional two years. If any performance test indicates noncompliance with the respective emission limit, a performance test for that pollutant shall be conducted annually until all annual performance tests over a 3-year period indicate compliance with the emission limit. The annual test for opacity shall be conducted in any case.
 - d. Per 40 CFR Part 62.14451(e)(1) through (3), the permittee may use the results of previous emissions tests to demonstrate compliance with the emissions limits, provided that the following conditions are met:
 - i. Your previous emissions tests must have been conducted using the applicable procedures and test methods listed in 40 CFR Part 62.14452. Previous emissions test results obtained using the EPA-accepted voluntary consensus standards are also acceptable.
 - ii. The HMIWI at your facility must currently be operated in a manner (e.g., with charge rate, secondary chamber temperature, etc.) that would be expected to result in the same or lower emissions than observed during the previous emissions test(s), and the HMIWI may not have been modified such that emissions would be expected to exceed the results from previous emissions test(s).
 - iii. The previous emissions test(s) must have been conducted in 1996 or later.
 - e. All performance tests must consist of a minimum of three test runs conducted under representative operating conditions;
 - f. The minimum sample time must be 1 hour per test run unless otherwise indicated in 40 CFR Part 62.14452;



- g. You must use EPA Reference Method 1 of 40 CFR Part 60, Appendix A-1 to select the sampling location and number of traverse points;
- h. You must use EPA Reference Method 3, 3A or 3B of 40 CFR Part 60, Appendix A-2 for gas composition analysis, including measurement of oxygen concentration. You must use EPA Reference Method 3, 3A or 3B of 40 CFR Part 60, Appendix A-2 simultaneously with each reference method. You may use ASME PTC-19-10-1981-Part 10 (incorporated by reference in 40 CFR 60.17) as an alternative to EPA Reference Method 3B or by an alternative method approved by OEPA;
- i. You must adjust pollutant concentrations to 7 percent oxygen using the following equation:

$$C_{adj} = C_{meas} (20.9 - 7) / (20.9 - \%O_2) \quad (\text{Eq. 1})$$

Where:

C_{adj} = pollutant concentration adjusted to 7 percent oxygen;

C_{meas} = pollutant concentration measured on a dry basis at standard conditions

(20.9-7) = 20.9 percent oxygen—7 percent oxygen (defined oxygen correction basis);

20.9 = oxygen concentration in air, percent; and

%O₂ = oxygen concentration measured on a dry basis at standard conditions, percent.

- j. You must use EPA Reference Method 5 of 40 CFR Part 60, Appendix A-3 or Method 26A or Method 29 of 40 CFR Part 60, Appendix A-8 to measure particulate matter (PM) emissions. You may use bag leak detection systems, as specified in 40 CFR Part 62.14454(e), or PM continuous emissions monitoring systems (CEMS), as specified in paragraph (o) of this section, as an alternative to demonstrate compliance with the PM emissions limit or by an alternative method approved by OEPA;
- k. You must use EPA Reference Method 6 or 6C of 40 CFR Part 60, Appendix A-4 to measure SO₂ emissions or by an alternative method approved by OEPA;
- l. You must use EPA Reference Method 7 or 7E of 40 CFR Part 60, Appendix A-4 to measure NO_x emissions or by an alternative method approved by OEPA;
- m. You must use EPA Reference Method 9 of 40 CFR Part 60, Appendix A-4 to measure stack opacity. You may use bag leak detection systems, as specified in 40 CFR Part 62.14454(e), or PM CEMS, as specified in paragraph (o) of this section, as an alternative to demonstrate compliance with the opacity requirements or by an alternative method approved by OEPA;



- n. You must use EPA Reference Method 10 or 10B of 40 CFR Part 60, Appendix A-4 to measure the CO emissions or by an alternative method approved by OEPA. You may use CO CEMS, as specified in paragraph (o) of this section, as an alternative to demonstrate compliance with the CO emissions limit;
- o. You must use EPA Reference Method 23 of 40 CFR Part 60, Appendix A-7 to measure total dioxin/furan emissions or by an alternative method approved by OEPA. The minimum sample time must be 4 hours per test run. You may elect to sample dioxins/furans by installing, calibrating, maintaining and operating a continuous automated sampling system, as specified in paragraph (p) of this section, as an alternative to demonstrate compliance with the dioxin/furan emissions limit. If you have selected the toxic equivalency (TEQ) standards for dioxin/furans under 40 CFR Part 62.14411, you must use the following procedures to determine compliance:
 - i. Measure the concentration of each dioxin/furan tetra-through octa-congener emitted using EPA Reference Method 23 of 40 CFR Part 60, Appendix A-7 or by an alternative method approved by OEPA;
 - ii. For each dioxin/furan congener measured in accordance with paragraph (k)(1) of this section, multiply the congener concentration by its corresponding TEQ factor specified in Table 2 of 40 CFR Part 62, Subpart HHH;
 - iii. Sum the products calculated in accordance with paragraph (k)(2) of this section to obtain the total concentration of dioxins/furans emitted in terms of TEQ.
- p. You must use EPA Reference Method 26 or 26A of 40 CFR Part 60, Appendix A-8 to measure HCl emissions or by an alternative method approved by OEPA. You may use HCl CEMS as an alternative to demonstrate compliance with the HCl emissions limit;
- q. You must use EPA Reference Method 29 of 40 CFR Part 60, Appendix A-8 to measure Pb, Cd and Hg emissions or by an alternative method approved by OEPA. You may use ASTM D6784-02 (incorporated by reference in 40 CFR 60.17) as an alternative to EPA Reference Method 29 for measuring Hg emissions. You may also use Hg CEMS, as specified in paragraph (o) of this section, or a continuous automated sampling system for monitoring Hg emissions, as specified in paragraph (q) of this section, as an alternative to demonstrate compliance with the Hg emissions limit. You may use multi-metals CEMS, as specified in paragraph (o) of this section, as an alternative to EPA Reference Method 29 to demonstrate compliance with the Pb, Cd or Hg emissions limits;
- r. You must use EPA Reference Method 22 of 40 CFR Part 60, Appendix A-7 to measure fugitive ash emissions and determine compliance with the fugitive ash emissions limit, as applicable, under 40 CFR Part 60.52c(c) or by an alternative method approved by OEPA. The minimum observation time must be a series of three 1-hour observations;



- s. If you are using a CEMS to demonstrate compliance with any of the emissions limits under 40 CFR Part 62.14411 or 62.14412, you:
 - i. Must determine compliance with the appropriate emissions limit(s) using a 12-hour rolling average, calculated as specified in section 12.4.1 of EPA Reference Method 19 of 40 CFR Part 60, Appendix A-7. Performance tests using EPA Reference Methods are not required for pollutants monitored with CEMS.
 - ii. Must operate a CEMS to measure oxygen concentration, adjusting pollutant concentrations to 7 percent oxygen as specified in paragraph (e) of this section.
 - iii. Must operate all CEMS in accordance with the applicable procedures under appendices B and F of 40 CFR Part 60. For those CEMS for which performance specifications have not yet been promulgated (HCl, multi-metals), this option takes effect on the date a final performance specification is published in the Federal Register or the date of approval of a site-specific monitoring plan.
 - iv. May substitute use of a CO CEMS for the CO annual performance test and minimum secondary chamber temperature to demonstrate compliance with the CO emissions limit.
 - v. May substitute use of an HCl CEMS for the HCl annual performance test, minimum HCl sorbent flow rate and minimum scrubber liquor pH to demonstrate compliance with the HCl emissions limit.
 - vi. May substitute use of a PM CEMS for the PM annual performance test and minimum pressure drop across the wet scrubber, if applicable, to demonstrate compliance with the PM emissions limit.
- t. If you are using a continuous automated sampling system to demonstrate compliance with the dioxin/furan emissions limits, you must record the output of the system and analyze the sample according to EPA Reference Method 23 of 40 CFR Part 60, Appendix A-7. This option to use a continuous automated sampling system takes effect on the date a final performance specification applicable to dioxin/furan from monitors is published in the Federal Register or the date of approval of a site-specific monitoring plan. If you elect to continuously sample dioxin/furan emissions instead of sampling and testing using EPA Reference Method 23 of 40 CFR Part 60, Appendix A-7, you must install, calibrate, maintain and operate a continuous automated sampling system and comply with the requirements specified in 40 CFR 60.58b(p) and (q) of subpart Eb;
- u. If you are using a continuous automated sampling system to demonstrate compliance with the Hg emissions limits, you must record the output of the system and analyze the sample at set intervals using any suitable determinative technique that can meet appropriate performance criteria. This option to use a continuous automated sampling system takes effect on the date a final



performance specification applicable to Hg from monitors is published in the Federal Register or the date of approval of a site-specific monitoring plan. If you elect to continuously sample Hg emissions instead of sampling and testing using EPA Reference Method 29 of 40 CFR Part 60, Appendix A-8, or an approved alternative method for measuring Hg emissions, you must install, calibrate, maintain and operate a continuous automated sampling system and comply with the requirements specified in 40 CFR 60.58b(p) and (q) of subpart Eb;

- v. Use of the bypass stack during a performance test will invalidate the performance test; and
- w. The test(s) shall be conducted at or near the maximum charge rate, unless otherwise specified or approved by the Ohio EPA, while burning representative waste. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of the performance test and a malfunction during testing shall invalidate the results. The permittee shall make available to the Ohio EPA Northeast District Office, upon request, any records that may be necessary to determine the conditions of the performance tests.

[Authority for term: 40 CFR Part 62, Subpart HHH and OAC rules 3745-77-07(C)(1), 3745-75-06(F) and 3745-15-04]

- (3) The Director (Ohio EPA Northeast District Office) may request a performance test or repeat performance test at any time, if in the Director's judgment there may be a violation of any applicable emission standard or if there has been a change in the operation of the HMIWI that may cause an increase in emissions due to a change in waste streams, infectious waste generators, or other operating conditions. Therefore, following the initial compliance demonstration and if required by the Director, the permittee shall also conduct performance testing of the HMIWI for SO₂, NO_x, D/F, As, Be, Cd, Cr, Pb, Hg, and/or Ni in order to demonstrate compliance with the limitations contained in this permit. The following applicable method(s) shall be used if it is determined a compliance demonstration is required for one or more of these pollutants:

Method 6 or 6C of 40 CFR Part 60, Appendix A to measure SO₂ emissions, or by an alternative method approved by OEPA;

Method 7 of 40 CFR Part 60, Appendix A, or by an alternative method approved by OEPA to measure NO_x emissions;

Method 23 of 40 CFR Part 60, Appendix A, or by an alternative method approved by OEPA to measure total dioxin/furan emissions. The minimum sample time shall be 4 hours per test run. If the permittee selected the percentage reduction standard for HCl under 40 CFR Part 62.14411, the procedure in 40 CFR Part 62.14452(k) must be followed; and

Method 29 of 40 CFR Part 60, Appendix A, or by an alternative method approved by OEPA to measure Pb, Cd, Hg, As, Be, Cr, and Ni emissions.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test"



Preliminary Proposed Title V Permit

Stericycle Inc

Permit Number: P0115341

Facility ID: 0278080634

Effective Date: To be entered upon final issuance

notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 90 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-75-06, and OAC rule 3745-15-04]

g) Miscellaneous Requirements

- (1) None.