OhioEPA
State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

Donald R. Schregardus
Director

Re: Permit to Install
Pike County
Application No: 06-3611
NESHAP

CERTIFIED MAIL

February 24, 1993

PIKE SANITATION COMPANY
MICHAEL MIGYANKO
11775 ST RT 220
WAVERLY, OH 45690

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

cc: US EPA
SOUTHEAST DISTRICT OFFICE, DAPC

Printed on recycled paper

State of Ohio Environmental Protection Agency

Permit to Install
Terms and Conditions

Application No. 06-3611
APS Premise No. 0666000003
Permit Fee: $400.00

Name of Facility: PIKE SANITATION COMPANY

Person to Contact: MICHAEL MIGYANKO

Address: 11775 ST RT 220
WAVERLY, OH 45690

Location of proposed source(s): 11775 ST RT 220
SEAL TWP, OHIO

Description of proposed source(s):
MODIFICATION TO INCREASE THE MAXIMUM DAILY INTAKE FROM 97 TO NS PER DAY TO 299 TONS PER DAY OF ASBETOS AND REFUSE.

Date of Issuance: February 24, 1993

Effective Date: February 24, 1993

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months, if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application and a $15 application fee must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for PIKE SANITATION COMPANY located in Pike County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification/ Description	BAT Determination	Applicable Federal and OAC Rules	Permit Allowable Mass Emissions and/ or Control & Usage Requirements
F001	Plant Roadways and Parking Areas	Watering, Surface Improvement, Speed Control	3745-31-05 (A)(3)	Comply With Special Terms and Conditions Included In This Permit To Install
F002	Asbestos and Refuse Handling (Modification To Increase Intake)	Compliance With NESHAP Requirements	3745-31-05 (A)(2)(e) 3745-31-05 (A)(3) 3745-15-07 3745-19 * 3745-20-05 3745-20-06 3745-20-07 3745-20-08 ORC 3704.03	Comply With Special Terms and Conditions Included In This Permit To Install

* National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart M - Asbestos (40 CFR 61.610-61.156) This permit applies only to air pollutant sources. It does not apply to solid waste disposal activities.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year
TSP	23.14

NESHAP REQUIREMENTS

The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

Source No.	Source Description	NESHAP Regulation
F002	Asbestos and Refuse Handling	Subpart M 40 CFR 61.140-61.156

The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 61 are also federally enforceable.

Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

1. Date of commencement of construction (no later than 30 days after such date);
2. Anticipated date of initial start-up (not more than 60 days or less than 30 days prior to such date);
3. Actual date of initial start-up (within 15 days after such date); and
4. Date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
Division of Air Pollution Control
Permit Management Unit
P.O. Box 1049
Columbus, OH 43266-0149

and

Ohio EPA, Southeast District Office
Air Pollution Group
2195 Front St
Logan, OH 43138

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than two years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Southeast District Office, 2195 Front Street, Logan, Ohio 43138.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

I. Operations and Authority

The specific operations, equipment and/or property, which constitute the air contaminant source and which are covered by this permit are listed in the following table with the applicable rules of the Ohio Administrative Code (OAC), Ohio Regulatory Code (ORC) and Code of Federal Regulations (CFR).

Operations, Equipment and/or property	Applicable Rules or regulations
Asbestos Waste Material Disposal	OAC 3745-20-05 OAC 3745-20-06 OAC 3745-20-07
Recordkeeping	OAC 3745-20-08
All Regulated Operations Authority to Enter	ORC 3704.03
Refuse Disposal, Cover, Soil Handling	OAC 3745-17-08 OAC 3745-15-07
Unpaved Roadways and Parking Areas	OAC 3745-17-08

II. Asbestos Disposal

This facility is subject to the provisions of the NESHAP, 40 CFR Part 61, Subparts A and M, and regulations adopted by the Ohio EPA at Chapter 3745-20 of the Administrative Code. This facility is authorized to accept and dispose of asbestos-containing materials in accordance with the conditions of this permit.

A. There shall be no visible emission from asbestos-containing materials during on-site transportation, transfer, unloading, deposition or compacting operations.

B. This facility shall inspect each load of asbestos-containing material delivered to the facility.

1. The inspection shall consist of visual examination of each load, sufficient to determine whether the friable asbestos-containing materials are received intact, leak-tight containers labeled with appropriate hazard warning labels, the waste generator and location of waste generation. The inspection shall determine whether the waste shipment records (WSR) required by

paragraph I, accompany the consignment and accurately describe the waste material and quantity.

2. If on the basis of the inspection the waste material is found to be improperly received, the load shall be disposed of in accordance with the procedures in the "Asbestos Spill Contingency Plan" described in Paragraph "F", and the discrepancy notation shall be made on the waste shipment record.

3. The owner or on-duty operator shall notify the Ohio Environmental Protection Agency Southeast District Office (hereinafter "SEDO") of any load of asbestos-containing material which is rejected, or any non-conforming load disposed of in accordance with the Asbestos Spill Contingency Plan. Notification shall be provided as soon as possible by a phone contact, followed in writing by the next working day providing a copy of the waste shipment record if available, or when waste is not shipped with a WSR, provide available information on vehicle identification, source of the load, a description of the load, nature of discrepancy, and the location of disposal. If possible, non-conforming loads of suspect friable material shall be detained or the location of disposal protected from damage until the Ohio EPA is informed and provided the opportunity to inspect.

C. Deposition and burial operations shall be conducted in a careful manner that prevents handling by equipment or persons that causes asbestos-containing waste materials to be broken up or dispersed before the materials are buried.

D. This facility shall establish restricted access, adequate to deter the unauthorized entry of the general public and any unauthorized personnel within one hundred feet of the unloading, deposition, burial and initial compaction of asbestos-containing waste materials areas. A hazard warning shall be displayed on signs not less than 20 x 14 inches, posted so they are visible before entering an area with asbestos waste disposal operations in progress; or alternatively mark vehicles used to transport asbestos-containing waste material with 21 x 14 inch signs during the loading and unloading of the waste so that the signs are displayed in such a manner and location that a person can easily read the legend. Display the following legend in the lower panel with letter sizes and styles of a visibility at least equal to those specified in this paragraph.

Legend:

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

Notation

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

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

E. This facility shall cover and compact asbestos wastes in accordance with the following:

1. As soon as practicable after the placement of friable asbestos, but no later than the end of each working day, the asbestos-containing waste material deposited at the site during the operating day shall be covered with at least twelve (12) inches of non-asbestos material. Once the load is covered this area may be compacted.

2. Care shall be taken to ensure that disposed asbestos shall not be re-excavated in subsequent operations. Any accidentally exposed material shall be immediately recovered in accordance with the provisions of condition "E1".

3. Asbestos-containing materials shall be separated from the landfill final grade by no less than 24 inches of compacted non-asbestos-containing material and a permanent cover of vegetation, or in accordance with current requirements for closure, whichever is most stringent.

F. This facility shall implement and maintain an "Asbestos Disposal Operating Procedure and Spill Contingency Plan" (Plan), consisting of: authorized personnel training, inspection and disposal operations procedures, non-conforming load response procedures, inventory and maintenance procedures for safety and emission control equipment, recordkeeping procedures, and emergency notification procedures. Authorized personnel shall be knowledgeable in the procedures and the Plan shall be

available for inspection at this facility at all times.

G. This facility shall have emission control equipment available for wetting and containing asbestos in the event of a release or non-conforming load disposal. All equipment required to implement the Plan shall be maintained in accordance with good engineering practices to ensure equipment is in a ready to use condition, and in an appropriate location for use.

H. This facility shall prepare and submit to the Southeast District Office, quarterly reports summarizing asbestos disposal activities. This report must contain the following information:

1. The name, address and location of this facility, the calendar period covered by the report, and changes in methods of storage or disposal operations.

2. A list of all asbestos-containing waste consignments received including: the date received, the name of the waste generator, the name and location of the facility where the load originated, the quantity of asbestos, and any discrepancy or non-conformity discovered.

3. These reports shall be submitted no later than January 15, April 15, July 15 and October 15 and shall cover the previous calendar quarter.

I. This facility shall require that all waste shipments received are accompanied by a waste shipment record.

1. The waste shipment record forms shall be retained at the facility for at least two years, and will be made available for inspection upon request.

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

3. Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and quantity actually received, attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the state, local, district, or EPA Regional Office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, the Southeast District. Describe the discrepancy and

attempts to reconcile it, and submit a copy of the waste shipment record along with the report.

J. Maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area.

K. Upon closure, comply with all the provisions of rule 3745-20-07.

L. Submit to the Southeast District, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities.

M. Furnish upon request, and make available at reasonable times during operating hours for inspection by the director, all records required under this section.

N. Notify the Southeast District in writing at least 45 days prior to excavating or otherwise disturbing an asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided at least 10 working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. Include the following information in the notice:

1. Scheduled starting and completion dates.

2. Reason for disturbing the waste.

3. Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. If deemed necessary, the Director may require changes in the emission control procedures to be used.

4. Location of any temporary storage site and the final disposal site.

III. <u>Authority to Enter</u>

Any representative of the Director of the Ohio Environmental Protection Agency may, upon presentation of proper identification, enter upon any portion of the property including any improvements thereon, at any reasonable time, to make inspections, take samples, conduct tests and examine records or reports pertaining to any emission of air contaminants and any

monitoring equipment, emission control equipment or methods. No operator or agent of this facility shall act in any manner to refuse, hinder, or thwart legal right of entry.

IV. Solid Waste Disposal

This facility shall ensure that solid wastes are deposited, spread and compacted in such a manner as to minimize or prevent visible emissions of dust. This facility shall require all truckloads of solid waste to be unloaded in a manner which will minimize the drop height of the solid wastes. Any dusty materials or wastes likely to become airborne shall be watered as necessary prior to or during dumping operations in order to minimize or eliminate visible emissions of fugitive dust. Watering shall be done in such a manner as to avoid the pooling of liquids and runoff. No dusty material shall be dumped during periods of high wind speed unless treated to prevent it from becoming airborne.

V. Unpaved Roadways and Parking Areas

In order to control emissions of fugitive dust this facility shall implement the following control measures:

A. This facility shall apply water or suitable dust suppression chemicals as often as necessary on all unpaved roads and parking areas in order to minimize or prevent visible emissions of fugitive dust. This requirement shall not apply when temperature is below 32°F.

B. Speed zones of no more than 10 miles per hour shall be established, posted and enforced by the owner or operator for all vehicles operating within the facility or facility-controlled access roads.

C. This facility shall operate and maintain a truck-mounted spray system to distribute water and/or dust suppression solution in order to minimize or eliminate visible emissions of fugitive dust generated by vehicle traffic on unpaved roadways and parking areas.

D. Paved roadways shall be maintained free of gross quantities of mud or dust to prevent tracking of materials onto public roadways and to minimize dust emissions from the facility roadways.

E. Stutter bumps shall be placed in the outgoing lane of the entrance road.

F. The first 300 feet of roadway from the public road shall be paved.