



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

Certified Mail

9/22/2015

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

JOSEPH SCUGOZA
C & D DISPOSAL TECHNOLOGIES, LLC
PO BOX 2219
WINTERSVILLE, OH 43953

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0641000257
Permit Number: P0089687
Permit Type: Renewal
County: Jefferson

Dear Permit Holder:

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

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

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-SEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
C & D DISPOSAL TECHNOLOGIES, LLC**

Facility ID:	0641000257
Permit Number:	P0089687
Permit Type:	Renewal
Issued:	9/22/2015
Effective:	9/22/2015
Expiration:	9/22/2025



Division of Air Pollution Control
Permit-to-Install and Operate
for
C & D DISPOSAL TECHNOLOGIES, LLC

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Final Permit-to-Install and Operate
C & D DISPOSAL TECHNOLOGIES, LLC
Permit Number: P0089687
Facility ID: 0641000257
Effective Date: 9/22/2015

Authorization

Facility ID: 0641000257
Application Number(s): A0020955, A0020954, A0044981, A0044980, A0020956, A0020952, A0020958, A0020949, A0020951, A0020950, A0020948, A0020953, A0020957, A0044979, A0044982
Permit Number: P0089687
Permit Description: Renewal PTIO for roadways, storage piles, and landfill operations.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/22/2015
Effective Date: 9/22/2015
Expiration Date: 9/22/2025
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

C & D DISPOSAL TECHNOLOGIES, LLC
FERNWOOD RD. 33
Cross Creek Twp., OH 44455

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

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0089687

Permit Description: Renewal PTIO for roadways, storage piles, and landfill operations.

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

Emissions Unit ID:	F001
Company Equipment ID:	Landfill Operations
Superseded Permit Number:	06-07604
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	Roadways and Parking
Superseded Permit Number:	06-07604
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	Storage Piles
Superseded Permit Number:	06-07604
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
C & D DISPOSAL TECHNOLOGIES, LLC
Permit Number: P0089687
Facility ID: 0641000257
Effective Date: 9/22/2015

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

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

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

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

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

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

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



Final Permit-to-Install and Operate
C & D DISPOSAL TECHNOLOGIES, LLC
Permit Number: P0089687
Facility ID: 0641000257
Effective Date: 9/22/2015

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
C & D DISPOSAL TECHNOLOGIES, LLC
Permit Number: P0089687
Facility ID: 0641000257
Effective Date: 9/22/2015

C. Emissions Unit Terms and Conditions

1. F001, Landfill Operations

Operations, Property and/or Equipment Description:

Construction and demolition debris (CDD) landfill and associated material handling

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions shall not exceed 57.0 tons/year. Visible fugitive particulate emissions shall not exceed 20% opacity, as a 3-minute average. Use of fugitive dust control measures at sufficient frequencies to comply with the above emission limitations. See b)(2)b through b)(2)d.
b.	OAC rule 3745-17-07(B)	The visible emission limitation specified by this rule is equivalent to the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
C.	OAC rules 3745-17-08(A) and 3745-17-08(B)	This fugitive dust source is located within an area identified in "Appendix A" of this rule;



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		however, the control measures specified by this rule are less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The landfill fugitive dust operations/sources that are covered by this permit and are subject to the requirements of OAC rule 3745-31-05 are listed below:
 - i. waste dumping/unloading;
 - ii. waste compaction;
 - iii. soil excavation and handling;
 - iv. covering of waste with soil; and
 - v. wind erosion from landfill surfaces.

- b. In accordance with the permit application, the permittee maintains that the inherent moisture content of the materials involved in fugitive dust operations/sources is at a level which is more than sufficient to comply with all applicable requirements. If at any time the moisture content is not sufficient to meet the above emission limitations, the permittee shall employ fugitive dust control measures to ensure compliance. Fugitive dust control measures can include, but are not limited to, the use of water, the use of other dust suppressant materials, or the use of non dust-producing approved cover materials.

- c. The above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the fugitive dust operation/sources until further observation confirms that use of the control measure(s) is unnecessary.

- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

- e. There shall be no open burning in violation of Ohio Administrative Code Chapter 3745-19 at this facility.

- f. The following asbestos requirements are to be met:

- i. The facility shall not accept for disposal any National Emission Standards for Hazardous Air Pollutants (NESHAP) regulated asbestos-containing material (RACM), as defined in the NESHAP Regulation for Asbestos, 40 CFR Part 61, Subpart M, Section 141 amended November 20, 1990 or any subsequent revisions or as defined in any Environmental Protection Agency Interpretive Rules concerning the NESHAP Regulation for Asbestos. This includes: (a) friable asbestos material, (b) Category I nonfriable asbestos-containing material that has become friable, (c) Category I nonfriable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II nonfriable asbestos containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.
- ii. This facility shall ensure that any asbestos-containing materials shall not become friable while at the landfill. If any asbestos material arrives at or becomes friable at the landfill, this facility shall adequately wet or encapsulate it if necessary to prevent visible emissions, and shall cover it with at least six (6) inches of non-asbestos-containing material before the end of the operating day.
- iii. All terms stated in this term are defined in the NESHAP regulation for Asbestos, 40 CFR Part 61, Subpart M, Section 141 amended November 20, 1990 or any subsequent revisions or in any Environmental Protection Agency Interpretive Rules concerning the NESHAP for Asbestos.

g. Hydrogen Sulfide Emissions Contingency Plan

Under Sub. Am. H.B. 397, effective December 22, 2005, Ohio EPA is required to develop rules governing the operation of construction and demolition debris (C&DD) landfills. Sub. Am. H.B. 397 authorizes the Director of Ohio EPA to adopt rules requiring contingency plans for effective action in response to hydrogen sulfide or other gases created by the operation of a C&DD facility. Because these rules are not yet written, Ohio EPA has not placed terms and conditions detailing the contingency plan requirements in this permit. However, Ohio EPA believes it is important to have in place a contingency plan to deal with potential hydrogen sulfide/other gas emissions from C&DD facilities. Therefore, as a condition of this permit, the permittee is required to develop and implement a hydrogen sulfide / other gas emission contingency plan by the dates required for sources in the C&DD rules developed in response to Sub. Am. H.B. 397.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the landfill fugitive dust operations/sources in accordance with the following frequencies:

landfill fugitive dust operations/sources	minimum inspection frequency
a. Waste dumping/unloading	once during each day of operation
b. Waste compaction	once during each day of operation
c. Soil excavation and handling	once during each day of operation
d. Covering of waste with soil	once during each day of operation
e. Wind erosion from landfill surfaces	once during each day of operation

- (2) The purpose of the inspections is to determine the need for implementing the abovementioned control measures for particulate emissions. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a landfill fugitive dust operation/source that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next inspection is within one week.
- (3) The permittee may, upon receipt of written approval from the Southeast District Office of Ohio EPA, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- (4) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information required by this term shall be kept separately for each landfill fugitive dust operation/source identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
- a. each day during which an inspection was not performed by the required frequency; and



- b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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:

$$F001(TPY)=(633 \times 10^{-4}) \times (365-p) \times (f) \times (\text{acres}) + (6.81 \times 10^{-5}) \times (\text{AMDWR}) \times (U/5)^{1.5} + (52.09)$$

Particulate emissions shall not exceed 57.0 tons/year.

Applicable Compliance Method:

The permittee shall demonstrate compliance by use of the following equation, derived using standard AP-42 and U.S. EPA emission factors, and accounts for emissions from wind erosion, daily cover material handling and placement, handling of waste (dumping waste), spreading, grading, and compaction of waste:

Where:

p is the no. of dates with more than 0.01 inch of precipitation (157.8 for Youngstown)

f is the percent of time wind speed is greater than 12 mph (22.54 for Youngstown)

acres is the maximum total exposed acreage at any time (assume working face never exceeds 2 acres)

AMDWR is the anticipated maximum daily waste receipt (250 tons/day from application)

U is the mean wind speed (10.0 for Youngstown)

- b. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity, as a 3-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A, Method 9.



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- g) Miscellaneous Requirements
 - (1) None.

2. F002, Roadways and Parking

Operations, Property and/or Equipment Description:

Facility Roadways and parking areas

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	No visible particulate emissions except for 3 minutes during any 60-minute observation period from any unpaved roadway or parking area surface. No visible particulate emissions except for 1 minute during any 60-minute observation period from any paved roadway or parking area surface. Particulate emissions shall not exceed 3 tons per year.
b.	OAC rule 3745-17-07(B)	See b)(2)f.
c.	OAC rules 3745-17-08(A) and 3745-17-08(B)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		pursuant to OAC rule 3745-31-05(A)(3). This fugitive dust source is located within an area identified in "Appendix A" of this rule; however, the control measures specified by this rule are less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. All roadways and parking areas are covered by this permit and subject to the above-mentioned requirements.
- b. In accordance with the permittee's permit application, the permittee has committed to treat the roadways and parking areas with water via a spray truck at sufficient treatment frequencies to ensure compliance and to limit vehicles to a speed of 10 miles per hour. If watering and speed reduction are not sufficient to control emissions, Ohio EPA may require additional fugitive dust control measures. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for any roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface resulting from the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- e. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

- f. There shall be no visible particulate emissions except for 1 minute during any 60-minute period from any paved roadway area surface where facility vehicles enter or leave the premises as a result of material drag out.
 - g. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
 - h. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
 - i. If control measures for the minimization of the deposit of mud or dust on public roads are insufficient to achieve compliance with applicable emission limitations and/or control requirements, Ohio EPA may require the permittee to submit to SEDO an approvable plan and schedule for the design, installation, maintenance, and operation of a wheel and undercarriage washing station that shall be used by all vehicles leaving the facility. The design shall include adequate onsite travel distance on well-maintained surfaces to allow the vehicles to properly "throw off" any excess water the truck wheels may hold to eliminate the potential of causing water slicks, ice, etc. from forming on any public thoroughfares.
- c) Operational Restrictions
- (1) Used oil, as defined by OAC rule 3745-279-01, shall not be used as a dust suppressant.
 - (2) The permittee shall have posted speed limit signs identifying 10 miles per hour as the maximum on-site speed limit on unpaved roadways.
- d) Monitoring and/or Recordkeeping Requirements
- (1) Except as otherwise provided in this section, the permittee shall perform daily inspections of the roadways and parking areas.
 - (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
 - (3) The permittee may, upon receipt of written approval from the Southeast District Office of Ohio EPA, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- (4) The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify any of the following occurrences:
- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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:

No visible particulate emissions except for 3 minutes during any 60-minute observation period from any unpaved roadway or parking area surface.



Applicable Compliance Method:

Compliance with the emission limitation for unpaved roadways and parking areas shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

(2) Emission Limitation:

No visible particulate emissions except for 1 minute during any 60-minute observation period from any paved roadway or parking area surface.

Applicable Compliance Method:

Compliance with the emission limitation for paved roadways and parking areas shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

(3) Emission Limitation:

Particulate emissions shall not exceed 3 tons per year.

$$E_{paved}(\text{ton/yr}) = 0.52 * (k_{paved} * (sL/2)^{0.65} * (W/3)^{1.5} - C) * (1-P/4N) * (\text{ton}/2000 \text{ lb}) * (\text{MILES}_{paved}) * (\text{MATLin}/\text{Avgpayload})$$

Applicable Compliance Method:

Compliance shall be determined by summing the emissions from the equations from AP-42 Chapter 13.2.2 (12/03) for paved and 13/2/2 (12/03) for unpaved roadways below:

$$E_{unpaved}(\text{ton/yr}) = 0.56 * (k_{unpaved} * (s/12)^a * (s/30)^b / (M/0.5)^c - C) * (365-P/2000 \text{ lb}) * (\text{MILES}_{unpaved}) * (\text{MATLin}/\text{Avgpayload})$$

Where:

k_{paved} is the particle size multiplier for paved roadways, 0.082 lb/VMT for TSP

sL is the road surface silt loading, 0.015 g/m² default value limited access roads

W is the mean vehicle weight, 27.5 tons, from application

C is the emission factor for 1980's vehicle fleet exhaust, brake wear and tear, 0.00047 lb/VMT

P is the number of days with more than 0.01 inch of precipitation, 157.8 for Youngstown

N is the number of days in the averaging period , 365 for 1-yr

kunpaved is the particle size multiplier for unpaved roadways, 6 lbs/VMT for TSP on public access roads

s is the surface material silt content, 6.4 % assumed

S is the established speed limit, 10 mph

M is the moisture content of the surface, assumed 10%

a is a constant, 1 for TSP on public access roads

c is a constant, 0.3 for TSP on public access roads

d is a constant, 0.3 for TSP on public access roads

MILESpaved is the total miles traveled on paved roads, round trip, from application 0.24 mile

MILESunpaved is the total miles traveled on unpaved roads, round trip, from application 1.8 miles

MATLin is the projected annual waste, aggregate, and sand brought on site, from application 106,500 tons

Avgpayload is the average amount of waste brought in each truck, from application 10 tons/truck

(4) Emission Limitation:

There shall be no visible particulate emissions except for 1 minute during any 60-minute period from any paved roadway area surface where facility vehicles enter or leave the premises as a result of material drag out.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.

3. F003, Storage Piles

Operations, Property and/or Equipment Description:

Facility Storage piles

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	There shall be no visible emissions of fugitive dust except for a period of time not to exceed 1 minute during any 60-minute observation period. Particulate emissions shall not exceed 3.8 tons per year from wind erosion and load-in and load-out operations. Use of fugitive dust control measures to comply with the visible emission limitation specified above. See b)(2)b through b)(2)f.
b.	OAC rule 3745-17-07(B)	The visible emission limitation specified by this rule is less stringent than the visible emission

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rules 3745-17-08(A) and 3745-17-08(B)	This fugitive dust source is located within an area identified in "Appendix A" of this rule; however, the control measures specified by this rule are less stringent than the control measures established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. All of the storage piles at this facility are covered by this permit and are subject to the requirements of OAC rule 3745-31-05.
- b. In accordance with the permittee's permit application, the permittee has committed to process aggregate material with inherently high moisture content and to minimize drop height distance from front-end loaders to ensure compliance. If at any time the moisture content is not sufficient to meet the above emission limitations for all load-in and load-out operations associated with storage piles, the permittee shall employ fugitive dust control measures to ensure compliance. Fugitive dust control measures can include, but are not limited to, the use of water, the use of other dust suppressant materials, or the use of non dust-producing approved cover materials. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The above-mentioned control measures shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measure is unnecessary.
- d. In accordance with the permittee's permit application, the permittee has committed to process aggregate material with inherently high moisture content to ensure compliance. If at any time the moisture content is not sufficient to meet the above emission limitation for wind erosion from the surfaces of all storage piles, the permittee shall employ fugitive dust control measures to ensure compliance. Fugitive dust control measures can include, but are not limited to, the use of water, the use of other dust suppressant materials, or the use of non dust producing approved cover materials. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- e. The above-mentioned control measures shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of additional control measures shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
 - f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile at this facility on a weekly basis.
 - (2) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile at this facility on a weekly basis.
 - (3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile at this facility on a weekly basis.
 - (4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
 - (5) The purpose of the inspections is to ensure continued compliance for load-in and load-out of a storage pile and for wind erosion from the surface of a storage pile and determine the need for implementing additional control measures. The inspections shall be performed during representative, normal storage pile operating conditions.
 - (6) The permittee may, upon receipt of written approval from the Southeast District Office of Ohio EPA, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
 - (7) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
- c. the dates the control measure(s) were implemented; and
- d. on a calendar quarter basis, the total number of days the control measure(s) were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit deviation (exceedance) reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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:

There shall be no visible emissions of fugitive dust except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emission limitation for the wind erosion and load-in and load-out operations from the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

b. Emission Limitation:

Particulate emissions shall not exceed 3.8 tons per year from wind erosion and load-in and load-out operations.

Applicable Compliance Method:

The permittee shall demonstrate compliance by summing the maximum potential emissions from wind erosion and material load in/out from soil storage piles. The potential emission rate for wind erosion is calculated as determined by the method from U.S. EPA's Control of Open Fugitive Dust Sources, Equation 4-9 (September 1988), as follows:

$$[1.9 * (s/1.5) * (365 - p)/235 * (f/15)] \text{ lb/acre/day} * 1 \text{ acre} * 365 \text{ days/yr} * \text{ton}/2,000 \text{ lbs}$$

where:

s = the silt content (%) of the cover material (assume 10%)

p = number of days with at least 0.01 inch of precipitation per year, 157.8 days (Youngstown)

f = percent of time wind is at least 12 mph, 27.5% (Youngstown)

The potential emission rate for waste handling is calculated as determined from AP-42, Chapter 13.2.4.3 (1/95), as follows: $E = [(0.74) * (0.0032) * (U/5)^{1.3} / (M/2)^{1.2}] \text{ lb/ton} * 35,750 \text{ tons/yr} * \text{ton}/2,000 \text{ lb} * 2$

where:

U = mean wind speed, 10 for Youngstown

M = moisture content of the soil, assume 10%

35,750 = cover soil material handled annually, estimated as half the annual waste receipt from application

2 = accounts for load-in and load-out

g) Miscellaneous Requirements

(1) None.