



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

9/20/2016

Certified Mail

Mr. Joe Tatarek
Apex Environmental, LLC - Sanitary Landfill
11 County Road 78
Amsterdam, OH 43903

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0641000223
Permit Number: P0120142
Permit Type: OAC Chapter 3745-31 Modification
County: Jefferson

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

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

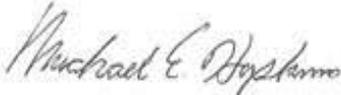
This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, 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: U.S. EPA
Ohio EPA-SEDO; Pennsylvania; West Virginia



Response to Comments

Facility ID:	0641000223
Facility Name:	Apex Environmental, LLC - Sanitary Landfill
Facility Description:	Sanitary landfill.
Facility Address:	11 County Road 78 P.O. Box 157 Amsterdam, OH 43903 Jefferson County
Permit:	P0120142, Permit-To-Install - OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Herald Star on 08/10/2016. The comment period ended on 09/09/2016.	
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. No comments were received.**



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Apex Environmental, LLC - Sanitary Landfill**

Facility ID:	0641000223
Permit Number:	P0120142
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	9/20/2016
Effective:	9/20/2016



Division of Air Pollution Control
Permit-to-Install
for
Apex Environmental, LLC - Sanitary Landfill

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Final Permit-to-Install
Apex Environmental, LLC - Sanitary Landfill
Permit Number: P0120142
Facility ID: 0641000223
Effective Date: 9/20/2016

Authorization

Facility ID: 0641000223
Facility Description: Sanitary landfill.
Application Number(s): M0001184, M0001497, A0055047, A0056362
Permit Number: P0120142
Permit Description: Chapter 31 modification permit to account for a lateral expansion of the landfill to a capacity of 83,600,000 cubic yards and increase in AMDWR to 10,000 tons per day.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$1,850.00
Issue Date: 9/20/2016
Effective Date: 9/20/2016

This document constitutes issuance to:

Apex Environmental, LLC - Sanitary Landfill
11 County Road 78
P.O. Box 157
Amsterdam, OH 43903

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120142

Permit Description: Chapter 31 modification permit to account for a lateral expansion of the landfill to a capacity of 83,600,000 cubic yards and increase in AMDWR to 10,000 tons per day.

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:	Paved and Unpaved Roadways and Parking Areas
Superseded Permit Number:	P0103987
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	Refuse Disposal Activities
Superseded Permit Number:	P0103987
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F003
Company Equipment ID:	Storage Piles
Superseded Permit Number:	06-07467
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F005
Company Equipment ID:	Material Handling Operations (rail/truck unloading)
Superseded Permit Number:	P0103987
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Apex Environmental, LLC - Sanitary Landfill
Permit Number: P0120142
Facility ID: 0641000223
Effective Date: 9/20/2016

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

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

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- 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 ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast 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.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

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

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

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

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

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



Final Permit-to-Install
Apex Environmental, LLC - Sanitary Landfill
Permit Number: P0120142
Facility ID: 0641000223
Effective Date: 9/20/2016

B. Facility-Wide Terms and Conditions



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 emissions unit contained in the permit is subject to 40 CFR Part 63 Subpart AAAA: F002. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Southeast District Office.
3. The following emissions unit contained in the permit is subject to 40 CFR Part 60 Subpart WWW: F002. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Southeast District Office.



Final Permit-to-Install
Apex Environmental, LLC - Sanitary Landfill
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Facility ID: 0641000223
Effective Date: 9/20/2016

C. Emissions Unit Terms and Conditions

1. F001, Unpaved Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Unpaved landfill roadways and parking areas throughout the site; Chapter 31 modification to increase VMT/year to 502,467; supersedes PTI P0103987 issued on 12/31/2009 for EUs F001 and F004

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures 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)	Develop and implement a site-specific work practice plan designed as described in d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)(5)	No visible PE from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period
c.	OAC rule 3745-17-08(B)	See b)(2)a. below.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures to minimize or eliminate visible PE of fugitive dust by:

i. The periodic application of asphalt, oil (excluding any used oil as defined in paragraph (A)(12) of rule 3745-279-01 of the Administrative Code), water or other suitable dust suppression chemicals on gravel roads and parking lots.

ii. The prompt removal, 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.

- iii. Requiring open-bodied vehicles transporting materials likely to become airborne to have such materials covered at all times if the control measure is necessary for the materials being transported.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees paved and unpaved roadways and parking areas. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each roadway or parking area, or segment of roadway or parking area, for which the plan applies. The permittee can select whether to develop a plan based on segments or entire roads.
- b. A determination of the frequency that each roadway, parking area or segment will be inspected to determine if additional control measures are needed. The frequency of inspection can either be common for all segments of the roadway or parking areas or may be identified separately for various segments of the roadway or parking areas.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:
 - i. Roadway, parking area, or segment inspected;
 - ii. Date inspected;
 - iii. Name of employee responsible for inspection
 - iv. Result of the inspection (needs treated or does not need treated);
 - v. A description of why no treatment was needed;
 - vi. Date treated;
 - vii. Name of employee responsible for roadway, parking area, or segment treatment; and
 - viii. Method used to treat the roadway, parking area, or segment.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the appropriate District Office or Local Air Agency (DO/LAA) for review and approval. The permittee can begin using the revised Work Practice Plan once the appropriate DO/LAA has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing 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) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

- a. The records required to be collected under the Work Practice Plan, and
- b. The date and reason any element of the Work Practice Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part A of this permit.

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the appropriate DO/LAA.
- (2) The permittee shall submit quarterly 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.
- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

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

a. Emissions Limitation:

No visible PE from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, visible emissions of fugitive dust shall be determined according to USEPA Method 22, with the modifications found in OAC rule 3745-17-03(B)(4).

g) Miscellaneous Requirements

(1) None.

2. F002, Refuse Disposal Activities

Operations, Property and/or Equipment Description:

Municipal solid waste (MSW) landfill refuse disposal activities including dumping, spreading, compacting, covering, and up to five landfill flares; Chapter 31 modification to increase AMDWR to 10,000 tons per day and capacity to 83,600,000 cubic yards; supersedes PTI P0103987 issued on 12/31/2009

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

(1) d)(7)-(10) and e)(4)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Non-methane organic (NMOC) emissions shall not exceed 16.87 tons per month averaged over a twelve-month rolling period.</p> <p>Methane (CH₄) emissions shall not exceed 1,682.42 tons per month averaged over a twelve-month rolling period.</p> <p>Volatile organic compounds (VOC) emissions shall not exceed 16.82 tons per month averaged over a twelve-month rolling period.</p> <p>Particulate emissions (PE) shall not exceed 7.05 tons per month averaged over a twelve-month rolling period.</p> <p>Emissions of particulate matter less than 10 microns (PM₁₀) shall not exceed 4.68 tons per month averaged over a twelve-month rolling period.</p> <p>Carbon monoxide (CO) emissions shall</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>not exceed 10.38 tons per month averaged over a twelve-month rolling period.</p> <p>Nitrogen oxide (NO_x) emissions shall not exceed 8.80 tons per month averaged over a twelve-month rolling period.</p> <p>Total hazardous air pollutants (HAPs) shall not exceed 1.65 tons per month averaged over a twelve-month rolling period.</p> <p>Hydrogen chloride (HCl) emissions shall not exceed 3.13 tons per month averaged over a twelve-month rolling period.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p> <p>See b)(2)a.-f. and b)(2)i. below.</p>
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid PSD review	<p>Sulfur dioxide (SO₂) emissions shall not exceed 249.0 tons per rolling, 12-month period.</p> <p>See c)(1) below.</p>
c.	OAC rule 3745-17-07(B)	Visible fugitive PE shall not exceed 20% opacity, as a three-minute average.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures to minimize or eliminate visible particulate emissions of fugitive dust.
e.	OAC rule 3745-114-01	See d)(7)-(10) and e)(4) below.
f.	<p>40 CFR Part 60, Subpart WWW (40 CFR Parts 60.750-759)</p> <p>[In accordance with 40 CFR Part 60.752 this emissions unit is an existing municipal solid waste landfill having a design capacity greater than 2.5 million Mg and a NMOC emission rate of greater than 50 Mg/yr, and is subject to the emissions limitations/control measures specified in this section.]</p>	<p>The permittee shall install a control system in accordance with 40 CFR Part 60.754(b)(2) that complies with 40 CFR Part 60.752(b)(2)(iii) (A) (<i>open flare</i>), (B) (<i>control system</i>) or (C) (<i>treatment system</i>).</p> <p><i>Open flare:</i></p> <p>Visible emissions from any open flare shall not exceed a total of 5 minutes during any 2 consecutive hours, and</p> <p>The open flare shall be designed and</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>operated in accordance with 40 CFR 60.18; or</p> <p><i>Control system:</i></p> <p>The control system shall be designed and operated to reduce NMOC by 98%, by weight; or, if the control is an enclosed combustion device, shall either reduce the NMOC by 98%, by weight or reduce the outlet NMOC concentration to less than 20 ppm by volume, on a dry basis as hexane at 3% oxygen, and</p> <p>Visible emissions from the stack serving any control device other than an open flare shall not exceed 10% opacity as a six-minute average; or</p> <p><i>Treatment system:</i></p> <p>The permittee shall route the collected gas to a treatment system that processes the collected gas for subsequent sale or use. All emissions from any atmospheric vent from the gas treatment system shall be subject to the requirements of 40 CFR Part 60.752(b)(2)(iii)(A) (<i>open flare</i>) or (B) (<i>control system</i>).</p>
g.	40 CFR Parts 60.1-60.19	The permittee shall comply with all applicable requirements of the General Provisions found in 40 CFR Part 60, Subpart A.
h.	40 CFR Part 63, Subpart AAAA (40 CFR Parts 63.1930-1990) [In accordance with 40 CFR Part 63.1935, this emissions unit is an existing solid municipal landfill with a design capacity greater than 2.5 million Mg and a NMOC emission rate of greater than 50 Mg/yr.]	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart WWW.
i.	40 CFR Part 63. 1-15 (63.1955(b))	Table 1 to Subpart AAAA of Part 63-Applicability of NESHAP General Provisions to Subpart AAAA shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
j.	40 CFR Part 61, Subpart M (40 CFR Parts 61.140-157)	Exempt.

(2) Additional Terms and Conditions

- a. The landfill fugitive dust operations/sources that are covered by this permit and 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. The permittee shall employ reasonably available control measures for the above-identified landfill fugitive dust operations/sources for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee has committed to watering the working face area to reduce emissions from the dumping of new dusty waste. Un-vegetated areas are to be kept as small as feasible and will be vegetated at the earliest convenience.
- 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 if there is snow and/or ice cover or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements (particulate emission limitations). Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. 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.
- e. The permittee shall ensure solid wastes are deposited, spread, and compacted in such a manner as to minimize or prevent visible emissions of fugitive dust. The permittee 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, but any watering shall avoid free liquids and runoff. No dusty material shall be dumped during periods of high wind speed unless treated to prevent it from becoming airborne.

- 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 BAT requirements of OAC rule 3745-17-08(B).
- g. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
- h. Deposition and burial operations of any suspected non-regulated asbestos-containing waste or demolition debris shall be conducted in a manner that prevents any asbestos content from being broken up or dispersed before such materials are buried.
- i. The facility cannot accept for disposal any regulated asbestos-containing material as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141 and OAC Chapter 3745-20, or any subsequent revisions to either rule. Regulated asbestos-containing material is defined to include:
 - i. friable asbestos material;
 - ii. Category I nonfriable asbestos-containing material that has become friable;
 - iii. Category I nonfriable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading; or
 - iv. 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.

The permittee shall be limited to accepting only non-regulated asbestos-containing waste materials. The permittee shall ensure that any Category I nonfriable asbestos-containing waste materials accepted for disposal will not be subjected to sanding, grinding, cutting, or abrading and shall not become friable during processing at the landfill; and shall ensure that Category II nonfriable asbestos-containing waste materials accepted for disposal do not become crumbled, pulverized, or reduced to powder by the forces expected to act on the material during its handling, transfer, and burial at the landfill. Any nonfriable Category I or Category II asbestos-containing material that was generated from a NESHAP source and which becomes friable also becomes subject to the Asbestos NESHAP regulations. If any regulated asbestos-containing waste material arrives at the landfill it cannot be accepted for disposal; and if any non-

regulated asbestos-containing material becomes friable after it is accepted for disposal the permittee shall:

- i. cause or permit no visible emissions to the outside air from the asbestos-containing waste materials during on-site transportation, transfer, deposition, or compacting operations;
 - ii. assure that deposition and burial operations are conducted in a manner which prevents handling by equipment or persons that causes asbestos-containing waste materials to be broken-up or dispersed before the materials are buried;
 - iii. cover the asbestos-containing waste material with at least 12 inches of non-asbestos-containing material, as soon as practicable after deposition, but no later than at the end of the operating day; and
 - iv. assure that during the unloading, deposition, burial and initial compaction of asbestos-containing waste materials, the disposal site is restricted adequately to deter unauthorized entry of the general public and any unauthorized personnel to within 100 feet of the operations.
- j. There shall be no open burning in violation of OAC Chapter 3745-19 at this facility.

c) Operational Restrictions

(1) The permittee has requested a federally enforceable restriction for the purposes of limiting the potential-to-emit of SO₂ emissions in order to avoid becoming a major stationary source subject to PSD review. In order to maintain compliance with the SO₂ emissions limitation in b)(1)b. above, the permittee has committed to the following:

- a. Install and operate a control device for SO₂ emissions, which achieves at least 70% control for SO₂ emissions, within 12 months of the date that the SO₂ emissions equal or exceed 225 tons of SO₂ per rolling, 12-month period, in accordance with the following equation:

$$\sum_{i=1}^n SO_{2uc}$$

Where:

SO_{2uc} = uncontrolled emissions (tons/month) = (TRS ppmv/10⁶) * (LFG flow to flare (scf/month) * (SO₂ MW)/(T_{std} * R) * (1 ton/2,000 lbs);

total reduced sulfur (TRS) ppmv = most recent quarterly measured value (ppmv);

LFG flow to flare (scf/month) = monthly average flow, as recorded in d)(2)a.;

SO₂ MW (molecular weight) = 64.066 lb/lb-mole;

T_{std} (standard temperature) = 520 °Rankine;

R (gas constant) = 0.7302 ft³*atm/°R*lb-mole; and

n = months in the rolling, 12-month period.

- b. SO₂ emissions shall not exceed 249.0 tons per rolling, 12-month period based on the following equations:

$$\sum_{i=1}^n (SO_{2uc} + SO_{2c})$$

Where:

Uncontrolled emissions (tons/month; SO_{2uc}) = (TRS ppmv/10⁶) * (untreated LFG flow to flare (scf/month)) * (SO₂ MW)/(T_{std} * R) * 1 ton/2,000 lbs;

Controlled emissions (tons/month; SO_{2c}) = (TRS ppmv/10⁶) * (LFG flow from control device to flare (scf/month)) * (SO₂ MW)/(T_{std} * R) * (100% - control efficiency) * (1 ton/2,000 lbs);

Untreated LFG flow to flare (scf/month) = monthly average flow, as recorded in d)(2)a.;

LFG flow from SO₂ control device to the flare (scf/month), as recorded in d)(2)b.;

Control efficiency of SO₂ control device ≥ 70%; and

n = months in the rolling, 12-month period.

The permittee has existing records that are sufficient to demonstrate compliance with the rolling, 12-month emissions limitation upon issuance of this permit.

- (2) The permittee shall cover and compact asbestos wastes in accordance with the following requirements:
 - a. As soon as practical after the placement of asbestos, but no later than the end of each working day, the asbestos containing waste materials deposited at the site during the operating day shall be covered with at least 12 inches of non-asbestos containing materials. Once the asbestos containing materials are covered, the area shall be compacted.
 - b. 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 this permit.
 - c. Asbestos containing waste materials shall be separated from the landfill final grade by no less than 24 inches of compacted non asbestos containing materials or by at least six inches of compacted non asbestos containing materials with a

permanent cover of vegetation over the area, or in accordance with current requirements for closure, whichever is more stringent.

- (3) See 40 CFR Part 60, Subpart WWW (40 CFR Parts 60.750-759)
 - (4) See 40 CFR Part 63, Subpart AAAA (40 CFR Parts 63.1930-1990)
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall monitor and record the TRS concentration, in ppmv, at the inlet to the flare on a quarterly basis.
 - (2) The permittee shall maintain monthly records of the following information:
 - a. records of the untreated LFG flow to the flare, in scf;
 - b. records of the LFG flow from the SO₂ control device to the flare, in scf;
 - c. the total SO₂ emissions, in tons per month, as recorded in c)(1)b. above; and
 - d. the rolling, 12-month summation of SO₂ emissions, in tons i.e., the summation of the SO₂ emissions, as recorded in c)(1)b. above, for the present month plus the previous 11 months of operation, in tons.
 - (3) The permittee shall keep for at least five years up-to-date, readily accessible, on-site records of the maximum design capacity, the current amount of solid waste in place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within four hours. Either paper or electronic formats are acceptable.
 - (4) 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:

<u>landfill fugitive dust operations/sources</u>	<u>minimum inspection frequency</u>
waste dumping/unloading	once during each day of operation
waste compaction	once during each day of operation
soil excavation and handling	once during each day of operation
covering of waste with soil	once during each day of operation
wind erosion from landfill surfaces	once during each day of operation
 - (5) The purpose of the inspections is to determine the need for implementing the above-mentioned 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.

- (6) 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 in d)(6) 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.

- (7) The permit-to-install (PTI) application for this emissions unit, F002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: toluene (HCl, dichloromethane (methylene chloride), ethylbenzene, xylenes)

TLV (mg/m³): 75.37 (toluene)

Maximum Hourly Emission Rate (lbs/hr): 1.35 (toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 125.26 (toluene)

MAGLC (ug/m³): 1,794.52 (toluene)

The permittee, has demonstrated that emissions of toluene (HCl, dichloromethane (methylene chloride), ethylbenzene, xylenes), from emissions unit F002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (8) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (10) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (11) See 40 CFR Part 60, Subpart WWW (40 CFR Parts 60.750-759)
- (12) See 40 CFR Part 63, Subpart AAAA (40 CFR Parts 63.1930-1990)

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify
 - a. any exceedance of the rolling 12-month summation of SO₂ emissions, in tons;
 - b. each day during which an inspection was not performed by the required frequency; and
 - c. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall submit a report that identifies the date that the SO₂ emissions equal or exceed 225 TPY of SO₂ on a rolling, 12-month average. This report shall be submitted within 30 days after the event occurs.
- (4) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum concentration. The report should include:
 - a. the original model input;
 - b. the updated model input;
 - c. the reason for the change(s) to the input parameter(s); and
 - d. a summary of the results of the updated modeling, including the input changes; and
 - e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

- (5) See 40 CFR Part 60, Subpart WWW (40 CFR Parts 60.750-759).
- (6) See 40 CFR Part 63, Subpart AAAA (40 CFR Parts 63.1930-1990).

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. Emissions Limitation:

NMOC emissions shall not exceed 16.87 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emissions limitation was established using the the Landfill Gas Emissions Model (LandGEM) version 3.02 results for a maximum landfill capacity of 68,256,580 Mg of compacted waste, AP-42 emission factors from Section 2.4, Municipal Solid Waste Landfills (10/08) and the following equations:

$$[(24,248 \text{ scfm, maximum LFG generation rate}) \times (838 \text{ ppmv, NMOC concentration in LFG}) \times (1 \text{ MMscf}/1,000,000 \text{ scf}) \times (86.18 \text{ lb-mol, molecular weight of NMOC, as hexane}) / ((0.7302 \text{ atm/scf, universal gas constant}) \times 520^\circ \text{ R})] \times (60 \text{ min/hr}) \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2,000 \text{ lbs} = 1,212 \text{ tons NMOC/yr uncontrolled}$$

$$\text{Fugitive NMOC} = 1,212 \text{ tons/yr} \times (1 - 0.85 \text{ capture efficiency of collection system}) = 181.8 \text{ tons/yr}$$

$$\text{Stack NMOC} = 1,212 \text{ tons/yr} \times 85\% \text{ capture efficiency} \times (1 - 0.98 \text{ control efficiency of flares}) = 20.60 \text{ tons/yr}$$

NMOC (tons per month averaged over a twelve-month rolling period)

$$= (181.8 \text{ tons/yr} + 20.60 \text{ tons/yr}) \times 1 \text{ yr}/12 \text{ months}$$

b. Emissions Limitation:

CH₄ emissions shall not exceed 1,682.42 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emissions limitation was established using the LandGEM version 3.02 results for a maximum landfill capacity of 68,256,580 Mg of compacted waste and AP-42 emission factors from Section 2.4, Municipal Solid Waste Landfills (10/08) and the following equations:

$$(24,248 \text{ scfm, maximum LFG generation rate}) \times (15\% \text{ not captured}) \times (50\% \text{ CH}_4 \text{ in LFG}) \times (16.04 \text{ lb-mol, molecular weight of CH}_4 / (0.7302 \text{ atm/scf, universal gas constant} \times 520^\circ \text{ R})) \times (60 \text{ min/hr}) \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2,000 \text{ lbs} = 20,189 \text{ tons CH}_4/\text{yr} \times 1 \text{ yr}/12 \text{ months}$$

c. Emissions Limitation:

VOC emissions shall not exceed 16.82 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emissions limitation was established using the LandGEM version 3.02 results for a maximum landfill capacity of 68,256,580 Mg of compacted waste and AP-42 emission factors from Section 2.4, Municipal Solid Waste Landfills (10/08), the NMOC calculations in f)(1)a., and the following equations:

$$\text{Fugitive NMOC} \times 99.7\% \text{ VOC in NMOC} = 181.30 \text{ tons/yr}$$

$$\text{Stack NMOC} \times 99.7\% \text{ VOC in NMOC} = 20.54 \text{ tons/yr}$$

VOC (tons per month averaged over a twelve-month rolling period)

$$= (181.30 \text{ tons/yr} + 20.54 \text{ tons/yr}) \times 1 \text{ yr}/12 \text{ months}$$

d. Emissions Limitation:

PE shall not exceed 7.05 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emissions limitation was established using the information presented in the permittee's application and the following equations from AP-42 13.2.4 equation 1 and USEPA: Control of Open Fugitive Dust Sources, Eq. 4-9 (9/88) for fugitive emissions and AP-42 Section 2.4 (10/08) for fuel burning emissions:

Fugitive:

Solid Waste Material Handling:

$$E \text{ (lbs emissions/tons material transferred)} = k \cdot (0.0032) \cdot (U/5)^{1.3} / (M/2)^{1.4}$$

Where:

k = 0.74 particle size multiplier

U = 10.0 mean wind speed (mph)

M = 11 %, material moisture content

$$E = 0.00054 \text{ lbs PE/ton material transferred} \times 3,650,000 \text{ tons of solid waste handled per year} \times 1 \text{ ton}/2,000 \text{ lbs} = 0.99 \text{ tons/yr}$$

Daily Cover Soils Material Handling:

$$E \text{ (lbs emissions/tons material transferred)} = k \cdot (0.0032) \cdot (U/5)^{1.3} / (M/2)^{1.4}$$

Where:

k = 0.74 particle size multiplier
 U = 10.0 mean wind speed (mph)
 M = 12 %, material moisture content
 E = 0.00047 lbs PE/ton material transferred x 1,095,000 tons of daily cover handled per year x 1 ton/2,000 lbs = 0.26 tons/yr

Wind Erosion from Landfill Surface:

$$E \text{ (lb/day/acre)} = 1.7 \cdot (s/1.5)^3 \cdot (365-p) / 235 \cdot (f/15)$$

Where:

s = 9.2% for clay/dirt mix (AP-42 Table 13.2.4-1)
 p = 145 days with >0.01 inch precipitation
 f = 30 %, percent of time wind speed exceeds 12 mph

$$E = 19.52 \text{ emission factor in lb PE/day/acre} \times 12 \text{ acres} \times 365 \text{ days/yr} \times 1 \text{ ton/2,000 lbs} = 42.75 \text{ tons/yr}$$

$$\text{Fugitive PE} = 0.99 \text{ tons/yr} + 0.26 \text{ tons/yr} + 42.75 \text{ tons/yr} = 44.0 \text{ tons/yr}$$

Flare Emissions:

$$15 \text{ lb PE/MMscf CH}_4 \times 12,744,801,202 \text{ scf/yr of LFG generated} \times 85\% \text{ capture} \times 50\% \text{ CH}_4 \text{ concentration in LFG} \times (1 \text{ MMscf}/1,000,000 \text{ scf}) \times (1 \text{ ton}/2,000 \text{ lbs}) = 40.62 \text{ tons/yr}$$

$$\text{PE (tons per month average over a twelve-month rolling period)} = (44.0 \text{ tons/yr} + 40.62 \text{ tons/yr}) \times 1 \text{ yr}/12 \text{ months} = 7.05$$

e. Emissions Limitation:

PM₁₀ emissions shall not exceed 4.68 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emissions limitation was established using the information presented in the permittee's application, the equations from AP-42 13.2.4 equation 1 and USEPA: Control of Open Fugitive Dust Sources, Eq. 4-9 (9/88) for fugitive emissions and AP-42 Section 2.4 (10/08) for fuel burning emissions, and the equations in f)(1)d. for material handling using a particle size multiplier (k) of 0.35 for PM₁₀ and a ratio of 35% PM₁₀/PE for wind erosion based on Air Pollution Engineering Manual, 2nd Edition, Figure 2 (2000):

$$\text{Fugitive PM}_{10} = 0.45 \text{ tons/yr} + 0.12 \text{ tons/yr} + 14.96 \text{ tons/yr} = 15.55 \text{ tons/yr}$$

$$\text{Flare PM}_{10} = \text{Flare PE} = 40.62 \text{ tons/yr}$$

PM_{10} (tons per month average over a twelve-month rolling period) = $(15.55 \text{ tons/yr} + 40.62 \text{ tons/yr}) \times 1 \text{ yr}/12 \text{ months} = 4.68$

f. Emissions Limitation:

CO emissions shall not exceed 10.38 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emission limitation was established by multiplying 46 lb CO/MMscf CH₄ x 12,744,801,202 scf/yr of LFG generated x 85% capture x 50% CH₄ concentration in LFG x (1 MMscf/1,000,000 scf) x (1 ton/2,000 lbs) = 124.58 tons/yr x 1 yr/12 months = 10.38 tons per month averaged over a twelve-month rolling period.

g. Emissions Limitation:

NOx emissions shall not exceed 8.80 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emission limitation was established by multiplying 39 lbs NOx/MMscf x 12,744,801,202 scf/yr of LFG generated x 85% capture x 50% CH₄ concentration in LFG x (1 MMscf/1,000,000 scf) x (1 ton/2,000 lbs) = 105.62 tons/yr x 1 yr/12 months = 8.80 tons per month averaged over a twelve-month rolling period.

h. Emissions Limitation:

Total HAP emissions shall not exceed 1.65 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emission limitation was established using the LandGEM version 3.02 results for a maximum landfill capacity of 68,256,580 Mg of compacted waste, and AP-42 emission factors from Section 2.4, Municipal Solid Waste Landfills (10/08), the information presented in the permittee's application, and the following calculation:

HAP (tons per month averaged over a twelve-month rolling period) =

Fugitive HAP

$$= \sum_{i=1}^n \frac{\text{HAP conc (ppmv)}}{1,000,000} \times \text{LFG} \left(\frac{\text{scf}}{\text{yr}} \right) \times (1 - \text{LFG collection efficiency})$$

$$\times \frac{\text{MW}}{T \times R} \times \frac{1 \text{ ton}}{2,000 \text{ lbs}} \times \frac{1 \text{ year}}{12 \text{ mos}}$$

Flare HAP

$$= \sum_{i=1}^n \frac{\text{HAP conc (ppmv)}}{1,000,000} \times \text{LFG} \left(\frac{\text{scf}}{\text{yr}} \right) \times (\text{LFG collection efficiency})$$

$$\times (\text{Destruction efficiency}) \times \frac{\text{MW}}{T \times R} \times \frac{1 \text{ ton}}{2,000 \text{ lbs}} \times \frac{1 \text{ year}}{12 \text{ mos}}$$

Where:

MW = molecular weight of each HAP, lb/lb-mole
 T = standard temperature, 520° Rankine
 R = universal gas constant, 0.7302 ft³*atm/°R*lb-mol
 n = total number of HAPs in LFG
 LFG collection efficiency = 85%
 Destruction efficiency = 98%, for organic species only

HAP (tons per month averaged over a twelve-month rolling period)
 = (17.76 tons/yr + 2.04 tons/yr) x 1 yr/12 months

i. Emissions Limitation:

HCl emissions shall not exceed 3.13 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method:

The emissions limitation was established using the following equation based on the information presented in the permittee's application:

$$[(24,248 \text{ scfm, maximum LFG generation rate}) \times (85\% \text{ capture}) \times (74.0 \text{ ppmv HCl}) \times (1 \text{ MMscf}/1,000,000 \text{ scf}) \times (36.5 \text{ molecular weight of HCl}) / ((0.7302 \text{ atm/scf, universal gas constant} \times 520^\circ \text{ R}))] \times (60 \text{ min/hr}) \times 8,760 \text{ hours/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \times 1 \text{ yr}/12 \text{ months}$$

j. Emissions Limitation:

SO₂ emissions shall not exceed 249.0 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with this emissions limitation shall be determined in accordance with the operational restriction in c)(1) above and the recordkeeping requirements in d)(1) and (2) above.

k. Emissions Limitation:

Visible fugitive PE shall not exceed 20% opacity, as a three-minute average.



Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9, with the modifications found in OAC rule 3745-17-03(B)(3)(a) and(b).

I. Emissions Limitation:

Should the permittee install a control system that complies with 40 CFR Part 60.752(b)(2)(iii)(A) (*open flare*), visible emissions from any open flare shall not exceed a total of five minutes during any two consecutive hours.

Applicable Compliance Method:

Compliance shall be determined in accordance with the procedures in f(2).

m. Emissions Limitation:

Should the permittee install a control system that complies with 40 CFR Part 60.752(b)(2)(iii)(B) (*control system*), the control system shall be designed and operated to reduce NMOC by 98% by weight; or, if the control is an enclosed combustion device, shall either reduce the NMOC by 98% by weight or reduce the outlet NMOC concentration to less than 20 ppm, by volume, on a dry basis as hexane at 3% oxygen.

Applicable Compliance Method:

Compliance shall be determined in accordance with the procedures in f(2).

n. Emissions Limitation:

Should the permittee install a control system that complies with 40 CFR Part 60.752(b)(2)(iii)(B) (*control system*), visible emissions from the stack serving any control device other than an open flare shall not exceed 10% opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined in accordance with the procedures in f(2).

o. Emissions Limitation:

Should the permittee install a treatment system that complies with 40 CFR Part 60.752(b)(2)(iii)(C) (*treatment system*), all emissions from any atmospheric vent from the gas treatment system shall meet the requirements of 40 CFR 60.752(B)(2)(iii)(A) or (B).

Applicable Compliance Method:

Compliance shall be determined in accordance with the procedures in f(2).

- (2) The permittee shall conduct or have conducted, performance testing for this emissions unit in accordance with the facility requirements and the requirements of 40 CFR Part 60, Subpart WWW (60.754(e)) and 60.18(f)) in conformance with the requirements specified below:
- a. The testing for the new or modified control equipment installation shall be conducted within 180 days after the initial startup of the approved control system.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable visible emission limitation for open flares in 40 CFR 60.752(b)(2)(iii)(A) or other control device specified in 40 CFR 60.752(b)(2)(iii)(A) or (B); and the control device reduction efficiency or ppm emission limitation specified in 40 CFR 60.752(b)(2)(iii)(B).
 - c. For an open flare, a performance test shall be conducted to demonstrate compliance with the requirements specified in 40 CFR 60.18. The net heating value of the gas being combusted in the flare and the actual exit velocity of the flare shall be determined in accordance with the procedures and methods specified in 40 CFR 60.754(e), except as may otherwise be approved in the permittee's collection and control system design plan.
 - d. For any other control device, Method 9 of 40 CFR Part 60, Appendix A shall be used to determine compliance with the visible emission limitations. Method 25, 25C, or Method 18 of Appendix A of this part must be used to determine compliance with the 98 weight-percent efficiency or the 20 ppmv outlet concentration level, unless another method to demonstrate compliance has been approved by the Administrator as provided by 40 CFR Part 60.752(b)(2)(i)(B). Method 3 or 3A shall be used to determine oxygen for correcting the NMOC concentration as hexane to 3%. In cases where the outlet concentration is less than 50 ppm NMOC as carbon (8 ppm NMOC as hexane), Method 25A should be used in place of Method 25. If using Method 18 of Appendix A, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42). The following equation shall be used to calculate efficiency:
$$\text{Control Efficiency} = (\text{NMOC}_{\text{in}} - \text{NMOC}_{\text{out}}) / (\text{NMOC}_{\text{in}})$$

where,

$$\text{NMOC}_{\text{in}} = \text{mass of NMOC entering control device}$$
$$\text{NMOC}_{\text{out}} = \text{mass of NMOC exiting control device}$$
 - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.
 - f. 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, Southeast District Office. The "Intent to Test" 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, Southeast District Office's refusal to accept the results of the emission test(s).

- g. Personnel from the Ohio EPA, Southeast 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.
- h. 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, Southeast District Office within 30 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, Southeast District Office.

g) Miscellaneous Requirements

- (1) None.

3. F003, Storage Piles

Operations, Property and/or Equipment Description:

Storage piles activities including load-in, load-out, and wind erosion of soil, sand, and aggregate; Chapter 31 modification to increase stockpile throughput to 138,848 tons per year and size to three acres to support an increase in AMDWR; supersedes PTI 06-07467 issued on 6/24/2004

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Develop and implement a site-specific work practice plan designed as described in d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)(6)	No visible particulate emissions except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
c.	OAC rule 3745-17-08(B)	Utilize reasonably available control measures to prevent fugitive dust from becoming airborne. See b)(2)a. through b)(2)d.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to maintain minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance.

- b. The above-mentioned control measure(s) 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 measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- c. The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to perform one or more of the following: (chemical stabilization, watering/sprinkling systems/hoses, covering the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The above-mentioned control measure(s) 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 measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) 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.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees material storage piles. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each storage pile or each storage pile area for which the plan applies.
- b. A determination of the frequency that each storage pile or each storage pile area will be inspected to determine if additional control measures are needed. The frequency of inspection can either be common for all storage piles or may be identified separately for various storage pile areas.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the storage piles. This form/record should include, at a minimum, the following elements:
 - i. Storage pile or storage pile area inspected;

- ii. Date inspected;
 - iii. Name of employee responsible for the inspection
 - iv. Result of the inspection (needs treated or does not need treated);
 - v. A description of why no treatment was needed;
 - vi. Date treated;
 - vii. Name of employee responsible for treatment of the storage pile or storage pile area; and
 - viii. Method used to treat the storage pile or storage pile area.
- d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the appropriate District Office or local air agency (DO/LAA) for review and approval. The permittee can begin using the revised Work Practice Plan once the appropriate DO/LAA has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the storage piles or storage pile areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal storage pile operating conditions. No inspection shall be necessary for a storage pile or storage pile 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 shall maintain records of the following information:

- a. The records required to be collected under the Work Practice Plan, and
- b. The date and reason any element of the Work Practice Plan was not implemented.

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the appropriate DO/LAA.
- (2) The permittee shall submit quarterly 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.
- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- f) Testing Requirements
- (1) Compliance with the Emission Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

No visible PE except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance Method:

If required, visible emissions of fugitive dust shall be determined according to USEPA Method 22, with the modifications found in OAC rule 3745-17-03(B)(4).
- g) Miscellaneous Requirements
- (1) None.

4. F005, Material Handling Operations (rail/truck unloading)

Operations, Property and/or Equipment Description:

Rail unloading and truck loading material handling; Chapter 31 modification to support an increase in AMDWR to 10,000 tons per day and capacity to 83,600,000 cubic yards; supersedes PTI P0103987 issued on 12/31/2009

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures 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)	Develop and implement a site-specific work practice plan designed as described in d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)(1)	Visible PE from any fugitive dust source shall not exceed 20% opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible particulate emissions of fugitive dust. See b)(2)a. through b)(2)c. below.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures on all material handling operations for the purpose of ensuring compliance with the above mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to use a spraying/misting system (i.e., the primary spray bar system or the portable misting units, as needed depending on weather conditions) to control any visible emissions which may occur from the material handling.

- b. The above control measures shall be employed for each material handling operation in the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
 - c. The permittee shall ensure that the unloading of materials from the railcars and the loading of materials into trucks shall be done in a manner that will minimize the drop height of the materials.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) Work Practice Plan

The permittee shall develop and implement a site-specific work practice plan designed to minimize or eliminate fugitive dust from the permittees material handling operations. This work practice plan shall include, at a minimum, the following elements:

- a. An identification of each material handling operation for which the plan applies. The permittee can select whether to develop a plan based on specific operations or operations as a whole.
- b. A determination of the frequency that each material handling operation will be inspected to determine if additional control measures are needed. The frequency of inspection can either be common for all material handling operations or may be identified separately for various material handling operations.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the material handling operations. This form/record should include, at a minimum, the following elements:
 - i. Material handling operation inspected;
 - ii. Date inspected;
 - iii. Name of employee responsible for inspection
 - iv. Result of the inspection (needs treated or does not need treated);
 - v. A description of why no treatment was needed;
 - vi. Date treated;
 - vii. Name of employee responsible for material handling operation treatment; and

viii. Method used to treat the material handling operation.

d. A description of how and where the records shall be maintained.

The permittee shall begin using the Work Practice Plan within 30 days from the date Ohio EPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the appropriate District Office or Local Air Agency (DO/LAA) for review and approval. The permittee can begin using the revised Work Practice Plan once the appropriate DO/LAA has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the material handling operations at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a material handling operation 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) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

- a. The records required to be collected under the Work Practice Plan, and
- b. The date and reason any element of the Work Practice Plan was not implemented.

The permittee shall maintain these records in accordance to the Standard Terms and Conditions of Part A of this permit.

e) Reporting Requirements

(1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the appropriate DO/LAA.

(2) The permittee shall submit quarterly 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 precipitation; and
- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

- (3) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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

Visible PE from any fugitive dust source shall not exceed 20% opacity as a three-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9, with the modifications found in OAC rule 3745-17-03(B)(3)(a) and (b).

- g) Miscellaneous Requirements
 - (1) None.