

Facility ID: 1652070026 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

[Go to Part II for Emissions Unit F001](#)  
[Go to Part II for Emissions Unit F002](#)  
[Go to Part II for Emissions Unit P001](#)

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652070026 Emissions Unit ID: F001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Roadways and parking areas	OAC rule 3745-31-05 (PTI 16-01458)	2.3 tpy of particulate matter See A.2.a and A.2.b below.
	OAC rule 3745-17-07	See A.2.c below.
	OAC rule 3745-17-08	See Section B below.

**2. Additional Terms and Conditions**

- (a) There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any 60-minute observation period.  
 There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed three minutes during any 60-minute observation period.  
 The fugitive particulate emission limitations required by OAC rule 3745-17-07(B)(4) and (B)(5) are less stringent than the fugitive particulate emission limitations required by the Best Available Technology determination.

**B. Operational Restrictions**

1. The permittee shall sweep the paved roadways and parking areas to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic. The following equipment shall be used to sweep the roadways and parking areas: sweeper truck. The paved surfaces shall be swept as necessary but, at a minimum, on a weekly basis. The permittee shall not be required to sweep during wet conditions when there is sufficient moisture to prevent visible emissions of fugitive dust.
2. The permittee shall apply dust suppressants to the unpaved roadways and parking areas to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic. Water or suitable dust suppression chemicals shall be used as the dust suppressant, and the following equipment shall be used for the periodic applications: watering truck. The dust suppressant shall be applied to the unpaved surfaces as necessary. This term and condition shall be waived during wet conditions when there is sufficient moisture to prevent visible emissions of fugitive dust.
3. Any material carried off of the permittee's property and deposited onto public streets by vehicular traffic or by erosion by water, etc., shall be promptly removed and disposed of properly to minimize or prevent resuspension.
4. A maximum speed limit of 10 miles per hour shall be posted and enforced on the property.
5. Open bodied vehicles transporting materials likely to become airborne shall be covered at all times.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records which include the following information for the paved roadways and parking areas:

- a. the date the paved surfaces were swept;
  - b. the portions of the paved surfaces that were swept; and
  - c. the name of the equipment operator responsible for the sweeping.
- 2. The permittee shall maintain records which include the following information for the unpaved roadways and parking areas:
  - a. the date dust suppressants were applied to the unpaved surfaces;
  - b. the portions of unpaved surfaces that were treated with dust suppressants;
  - c. the application rate of water and any chemical additives (gallons of each per square yard); and
  - d. the name of the equipment operator responsible for the application of the dust suppressants.
- D. **Reporting Requirements**
- 1. None
- E. **Testing Requirements**
- 1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
2.3 tpy of particulate matter  
  
Applicable Compliance Method:  
  
For Unpaved Roadways  
  
$$[k(5.9)[s/12][S/30][W/3]^{0.7}[w/4]^{0.5}[(365-p)/365]](VMT \text{ per year})/2000$$
  
(AP-42, 5th edition, section 13.2.2, page 13.2.2-1)  
  
For Paved Roadways  
  
$$[0.9[(E)+0.2(T/4)+5.07(T/4)]/454](VMT \text{ per year})/2000$$
  
(Ohio EPA, RACM, page 2-8)  
Emission Limitation:  
  
no visible particulate emissions  
  
Applicable Compliance Method:  
  
OAC rule 3745-17-03(B)(4)
- F. **Miscellaneous Requirements**
- 1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652070026 Emissions Unit ID: F002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

#### Part II - Special Terms and Conditions

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (a) None.
  - 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (a) None.
- A. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	--------------------------------------	--

Soil Handling and Storage	OAC rule 3745-31-05 (PTI 16-01458)	0.45 tpy of particulate matter See A.2.a below.
	OAC rule 3745-17-07	See A.2.b below.
	OAC rule 3745-17-08	See A.2.c below.

2. **Additional Terms and Conditions**

- (a) There shall be no visible particulate emissions from any storage pile except for a period of time not to exceed one minute during any 60-minute observation period.  
The fugitive particulate emission limitation required by OAC rule 3745-17-07(B)(6) is less stringent than the fugitive particulate emission limitation required by the Best Available Technology determination.  
The permittee shall take reasonably available control measures to prevent fugitive dust from becoming airborne through the periodic application of water on the material handling and storage piles.

B. **Operational Restrictions**

- 1. This facility shall ensure Petroleum Contaminated Soils (PCS) are deposited, spread and compacted in such a manner as to minimize or prevent visible emissions of fugitive dust. This facility shall require all truckloads of PCS to be unloaded in a manner which will minimize the drop height of the solid wastes. Any dusty materials or wastes likely to become airborne shall be watered as necessary prior to or during dumping operations in order to minimize or eliminate visible emissions of fugitive dust. Watering shall be done in such a manner as to avoid the pooling of liquids and runoff. No dusty material shall be dumped during periods of high wind speed unless it has been treated to prevent it from becoming airborne.
- 2. Contaminated soil shall be stored in such a manner so that any liquid runoff shall be contained, captured and disposed of according to applicable state and federal regulations.

C. **Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall maintain records which include the following information for the material handling and storage piles:
  - a. the date dust suppressants were applied to the storage piles;
  - b. the portions of storage piles that were treated with dust suppressants;
  - c. the application rate of water and any chemical additives (gallons of each per square yard); and
  - d. the name of the equipment operator responsible for the application of the dust suppressants.

D. **Reporting Requirements**

- 1. None

E. **Testing Requirements**

- 1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
0.45 tpy of particulate matter  
Applicable Compliance Method:  
Load-in  
 $k(0.0032[(U/5)^{1.3}/(M/2)^{1.4}])(\text{tons of material loaded-in per year})$   
AP-42 5th edition Chapter 13.2.4 equation (1)  
Load-out  
 $k(0.0032[(U/5)^{1.3}/(M/2)^{1.4}])(\text{tons of material loaded-out per year})$   
AP-42 5th edition Chapter 13.2.4 equation (1)  
Emission Limitation:  
no visible particulate emissions  
Applicable Compliance Method:  
OAC rule 3745-17-03(B)(4)

F. **Miscellaneous Requirements**

- 1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652070026 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Air vacuum and bioreactor	OAC rule 3745-31-05 (PTI 16-01458)	0.75 lb/hr non-methane organic compounds (NMOC) 3.07 lbs/hr total organic compounds (including methane) See A.2.a, A.2.b and C.1 below.
	OAC rule 3745-21-07	See A.2.c below.

**2. Additional Terms and Conditions**

- (a) The permittee shall maintain and operate a carbon adsorption system to collect waste gases from the vacuum system with continuous emission monitoring for non-methane organic compounds (NMOC) in accordance with the manufacturer's recommendations, instructions, and operating manual(s). Bypassing of control units during replacement or regeneration of the carbon employed in the air pollution control equipment is prohibited. The organic compound emission limitations required by OAC rule 3745-21-07 are less stringent than the organic compound emission limitations required by the Best Available Technology determination.

**B. Operational Restrictions**

1. The average VOC concentration in the exhaust gases from the carbon adsorber, for any 3-hour block of time, shall not exceed a VOC concentration (ppm) which is 20 percent greater than the average concentration during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall use no more than one half gallon of diesel fuel per day in the reactor.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain instrumentation sufficient to continuously measure and record the non-methane organic compounds (NMOC) emitted from the carbon adsorption unit on P001.
 

Mass emissions for non-methane organic compounds shall be calculated as follows:  $ME = K \times 0.0087 \times PPM \times Q / (F + 460)$ . Where ME = pounds NMOC per hour, K = isobutylene/benzene correction  $56/80 = 0.7$ , PPM = gas concentration, Q = flow in cfm, F = temperature in Fahrenheit. This formula may be revised based on testing for baseline emissions under term E.1.g.
2. The permittee shall maintain a record of the following data for the soil gas extraction unit P001.
  - a. for an excursion above the "action level" as detailed in Section E.1.g below and established during the emission test: the time(s) of day and date of the event, the non-methane organic compound measurement, an explanation for the cause of the measurement, a quantification of mass emissions (lbs/hour) during the event, and any actions taken to correct the situation (If the calculated emission rate would exceed 0.75 lbs NMOC/hr, the vacuum pumps shall be shut down.);
  - b. the results of all analysis of the soil remediated for total petroleum hydrocarbon, BTEX, and volatile organic compound;
  - c. the date on which a vacuum pump is removed from service, the size of any replacement pumps, the date of installation for any replacement pumps, and the resulting air flow rate for each carbon adsorption emissions unit; and
  - d. the number of cubic yards of contaminated soil added or removed from the cell shall be recorded with weight data, if available.
3. In accordance with procedures described by Ohio EPA's Operation and Maintenance Guidelines for Air Pollution Control Equipment, the permittee shall conduct and record a daily inspection of the carbon adsorption system employed for each emissions unit. This inspection shall include the following, as a minimum:
  - a. visible liquid leaks;
  - b. system leaks as determined by loss of pressure at the inlet to the carbon adsorption unit;
  - c. pressure drop across the carbon adsorption emission units; and

d. carbon change out for the emission units.

4. The permittee shall operate and maintain an organic compound continuous emission monitoring system (OC CEMS) which measures and records the VOC concentrations in the exhaust gases from the carbon adsorber when the emissions unit is in operation. The OC CEMS shall be capable of satisfying the performance requirements specified in 40 CFR Part 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the OC CEMS satisfies the requirements of Performance Specification 8 or Performance Specification 9. The OC CEMS shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).
5. The permittee shall collect and record the following information each day:
  - a. a log of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
  - b. the average VOC concentration in the exhaust gases from the carbon adsorber during each of the eight 3-hour blocks of time during the day; and
  - c. the number of gallons of diesel fuel consumed by the reactor.
6. The permittee shall develop and maintain a quality assurance/quality control (QA/QC) plan for the OC CEMS that includes, at a minimum, the following information and procedures:
  - a. the manufacturer and model number of the OC CEMS;
  - b. the procedure for calibrating the instrumentation, including the frequency of calibration and calibration gas concentrations to be used;
  - c. calibration drift determination and adjustment of CEMS;
  - d. preventive maintenance of CEMS (including spare parts inventory);
  - e. data recording, calculations and reporting;
  - f. accuracy audit procedures;
  - g. program of corrective action for malfunctioning CEMS; and
  - h. operating conditions for each carbon adsorption unit including average air flow rate, temperature ranges for inlet and outlet gases and expected hours of downtime per day to pump out the knockout tanks under either dry or wet weather conditions.

This plan shall be submitted to the manufacturer of the OC CEMS for comment. Copies of any manufacturer's comments shall be submitted with the plan.

#### D. Reporting Requirements

1. The permittee shall submit a report to the Akron Air Quality Management District for each excursion above the action level as specified in section C.2.a above. This report shall contain all information specified by section C.2.a and be submitted within fourteen (14) days of each event. Submittal of this report in no way waives the reporting requirement of OAC rule 3745-15-06 for P001.
 

The permittee shall submit a report to the Akron Air Quality Management District for any changes in the air treatment system as specified in section C.2.c within fourteen days of each event.
2. The permittee shall submit a report to the Akron Regional Air Quality Management District for each gas leak or carbon bed change out, as specified in Sections C.3.b and C.3.d. This report shall detail the time and date of each occurrence with the length of time during which the carbon adsorber was bypassed. This report shall be submitted within fourteen (14) days of each occurrence.
3. The permittee shall submit VOC concentration deviation (excursion) reports that identify all 3-hour blocks of time during which the average VOC concentration of the exhaust gases from the carbon adsorber exceeded the concentration limitation specified in Section B.1 above.
4. The permittee shall submit the QA/QC plan, specified in Section C.6, to the Akron Regional Air Quality Management District for approval.

#### E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 

The emission testing shall be conducted within 6 months after issuance of this permit renewal unless a test waiver has been approved as specified in Section E.1.f.

The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for organic compounds.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 18 of 40 CFR 60, Appendix A.

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 appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the

test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

In lieu of performing the aforementioned on-site testing, test results from identical operations, with the same operating conditions, may be accepted provided the untreated soil is identical in type and quantities of air contaminants, and the test waiver is approved by the Ohio EPA. The request for a test waiver shall be submitted to the Akron RAQMD at least 90 days prior to the test deadline specified in E.1.a above.  
Baseline Emissions

An "action level" concentration shall be established for non-methane organic compounds during an emission test, using procedures and methods approved by Ohio EPA, of exhaust gases from the carbon adsorption unit for P001. This test shall be conducted using Methods 1-4 and 18 (40 CFR Part 60) at a maximum gas flow rate and at a condition generating the highest uncontrolled mass emissions of non-methane organic compounds.

F. **Miscellaneous Requirements**

1. None