



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

03/18/2022

Certified Mail

Brad Bashore
Sunny Farms Landfill
12500 West County Road 18
Fostoria, OH 44830

Facility ID: 0374010199
Permit Number: P0125384
County: Seneca

RE: **DRAFT AIR POLLUTION TITLE V PERMIT**
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Advertiser Tribune. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) website here: <https://epa.ohio.gov/dapc/permitsonline>. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

A handwritten signature in black ink that reads "Michael E. Hopkins".

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

cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO; Michigan

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <https://epa.ohio.gov/actions> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Title V Permit Renewal
Sunny Farms Landfill
12500 West County Road 18

Fostoria, OH 44830

ID#: P0125384
Date of Action: 03/18/2022
Permit Desc: Title V renewal for a solid waste and C&DD landfill, railcar unload building and solid waste and asbestos landfill.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://epa.ohio.gov/dapc/permitsonline> by entering the ID # or: Jason Ko, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Rd., Bowling Green, OH 43402. Ph: (419)352-8461



Statement of Basis* For Air Pollution Title V Permit

* As defined in OAC rule 3745-77-01(MM): "Statement of basis" or "SOB" means a statement that sets forth the legal and factual basis for the draft [Title V] permit conditions (including references to the applicable statutory or regulatory provisions)."

Completing this form is intended to satisfy those requirements.

Facility ID:	0374010199
Facility Name:	Sunny Farms Landfill
Facility Description:	Refuse Systems
Facility Address:	12500 West County Road 18, Fostoria, OH 44830
Permit #:	P0125384, Title V Permit - Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input checked="" type="checkbox"/> Sulfur Dioxide <input checked="" type="checkbox"/> Carbon Monoxide <input type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input type="checkbox"/> GHG And/or subject to: <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s) <input type="checkbox"/> GACT standard(s) that requires a Title V permit <input type="checkbox"/> Title IV <input type="checkbox"/> Opt-In source	

A. Permit Background

1. Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(V)?		
Yes X	No	Comments:
2. Discuss any common control determinations (this includes revisions to previous determinations), include justification, factors, and facts which led to the final decision.		
Discussion:		



3. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E). This includes identifying conditions from previous permits that are not included in the new permit.

PTI No.: | Affected EUs:

Discussion of changes from the previous Title V:

4. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a minor modification per OAC rules 3745-77-08(C)(1) or (2)

PTI No.: P0131385 | Affected EUs: F003

Minor Modification Description: Administrative modification to require the use of a mister system and define best available control measures for fugitive dust..

5. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)

PTI No.: P0128797 | Affected EUs: P902

Significant Modification Description: Administrative modification to allow for the installation of a new H2S control system, consisting of a dual train scrubber system, enclosed flare and an open flare to be used during startup shutdown and maintenance. The permit also establishes BACT requirements for H2S and SO2.

6. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)

PTI No.: | Affected EUs:

Reopening for Cause for Description:

7. Please identify the affected emissions unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.

Affected EUs:

8. Please identify any federal Consent Decree (CD) that resulted in the addition of Title V T&Cs - include the CD Number, the CD Public Notice date (if known) and Ohio EPA Permit Number (if applicable, along with final permit issuance date) that incorporates the CD requirements.



CD No.	Public Notice Date:	PTI No.	PTI Issuance Date:
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9. Please identify any complex or unusual rule applicability determination that is not readily apparent in the permit T&Cs and warrants additional explanation in the Statement of Basis. If the discussion is included in a PTI Permit Strategy Write Up cite the Permit Number and copy/paste or summarize the determination here.

PTI No.	Discussion:
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10. Please identify any streamlining determinations within the permit. Include an identification of the subsumed limit(s) and explanation of how the resulting limit is equivalent to or more stringent than those subsumed. If the discussion exists in a PTI Permit Strategy Write Up, cite the Permit Number and summarize the determination here. This would also be noted for specific emissions units identified in C.

PTI No.	Discussion:
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11. Please identify any current enforcement actions to address violations at the facility resulting in a compliance plan and schedule.

Director's Final Findings and Orders; AGO Consent Decree; or U.S. EPA Consent Decree Date: July 26, 2019	List the Order/Injunctive Relief number from the associated enforcement document and provide a description: State of Ohio Partial Consent Order 19-CV-0224, July 26, 2019: Sunny Farms Landfill exceeded the PSD significant threshold for SO ₂ and H ₂ S. The Partial Consent Order required the facility to install interim controls and comply with an interim SO ₂ emission limitation until permanent control equipment is installed. Sunny Farms Landfill was issued PTI P0128797 which established BACT requirements for SO ₂ and H ₂ S emissions. The facility is required to install a Lo-Cat [®] system and enclosed flare within 550 days of permit issuance. The facility is also required to continue to operate the existing open flare during periods of downtime (including startup, shutdown and malfunction) whenever the Lo-Cat [®] system and/or enclosed flare is not operating.
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B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis	Other	Comments
	SIP (3745-)		



B.2.			There are no insignificant emissions units with applicable requirements at this facility
B.3.	77-07(A)(1)	40 CFR, Part 63, Subpart AAAA	Regarding applicability of P902 to 40 CFR, Part 63, Subpart AAAA.
B.4.	77-07(A)(1)	40 CFR, Part 60, Subpart Cf	Regarding 40 CFR, Part 60, Subpart Cf: Once updates to OAC rule 3745-76 are finalized, facility will no longer be subject to 40 CFR, Part 62, Subpart OOO.

C. Emissions Unit Terms and Conditions

<p>Key:</p> <p>EU = emissions unit ID</p> <p>ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)</p> <p>OR = operational restriction</p> <p>M = monitoring requirements</p> <p>ENF = did noncompliance issues drive the monitoring requirements?</p>	<p>R = record keeping requirements</p> <p>Rp = reporting requirements</p> <p>ET = emission testing requirements (not including compliance method terms)</p> <p>Misc = miscellaneous requirements</p>
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Emissions Unit Table



EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Section C.1: F002, Plant Roadways and Parking Areas											
	Visible emissions restrictions – See comments*	ORC 3704.03(T) PTI P0107591	N	N	Y	Y	Y	N	N	N	<p>Limitations: *No visible PE except for one minute during any 60-minute period for paved roadways and parking areas and *No visible PE except for three minutes during any 60-minute period for unpaved roadways and parking areas</p> <p>ET: M/R/Rp are sufficient to demonstrate compliance. If required, compliance shall be determined through visible emission observations performed in accordance with Method 22 of 40 CFR, Part 60, Appendix A.</p>
Section C.2.: F003, Railcar Unload Building											
	0.98 ton fugitive PM10/year	OAC rule 3745-31-05(F) PTI P0131385	N	Y	Y	Y	Y	N	N	N	<p>ET: None normally required for fugitive PE. Compliance is based on AP-42 emission factors, waste acceptance rates and control efficiencies. M/R/Rp are sufficient to demonstrate compliance.</p>
	Visible emissions restrictions – See comments*	OAC rule 3745-31-05(F) PTI P0131385	N	Y	Y	Y	Y	N	N	N	<p>Limitations: *No visible PE from the egress points serving the building enclosure except for six minutes during any sixty-minute period and *No visible PE from the outdoor railcar cleanup operations except for six minutes during any sixty-minute period.</p> <p>ET: M/R/Rp are sufficient to demonstrate compliance. If required, compliance shall be determined through visible emission observations performed in accordance with Method 22 of 40 CFR, Part 60, Appendix A.</p>



EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	None	OAC rule 3745-15-07	N	N	N	N	N	N	N	Y	Misc: Facility may be required to perform a measurement and characterization of air contaminants emitted to demonstrate whether it is causing, permitting or maintain a public nuisance. The results of the assessment will be used to evaluate any measures that the facility may need to employ to control the odors.
Section C.3: P902, Solid Waste/Asbestos Landfill											
	337.6 tons SO2 rolling, 12-month period	OAC rule 3745-31-10 through 20 PTI P0128797	N	Y	Y	Y	Y	N	N	N	ET: M/R/Rp are sufficient to demonstrate compliance.
	146.95 tons H2S rolling, 12-month period	OAC rule 3745-31-10 through 20 PTI P0128797	N	Y	Y	Y	Y	N	N	N	ET: M/R/Rp are sufficient to demonstrate compliance.
	Reduce H2S concentrations to the following, except during periods of startup,	OAC rule 3745-31-10 through 20 PTI P0128797	N	Y	Y	Y	Y	Y	N	N	



Statement of Basis
Sunny Farms Landfill
Permit Number: P0125384
Facility ID: 0374010199

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	shutdown, and maintenance: For collected LFG with an H ₂ S concentration greater than 10,000 ppmv, the control system shall achieve a minimum of 98% reduction in H ₂ S concentration (by volume) in the untreated LFG For collected LFG with an H ₂ S concentration equal to, or										



Statement of Basis
 Sunny Farms Landfill
 Permit Number: P0125384
 Facility ID: 0374010199

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	less than 10,000 ppmv, the control system shall achieve a maximum outlet concentration of H2S (by volume) no greater than 200 ppmv.										
	Enclosed flare emissions: Designed and operated with no visible emissions except for periods not to exceed a total of 5 minutes during any 2	OAC rule 3745-31-10 through 20 PTI P0128797	N	Y	Y	Y	Y	Y	N	N	



Statement of Basis
 Sunny Farms Landfill
 Permit Number: P0125384
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EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	consecutive hours.										
	Enclosed flare emissions: 35.5 lbs/hr, as a 24-hour daily average, during normal operations (when both H2S control system trains are operational); 20.5 lbs/hr, as a 24-hour daily average when only one of the two H2S control system trains is operational.	OAC rule 3745-31-10 through 20 PTI P0128797	N	Y	Y	Y	Y	Y	N	N	



Statement of Basis
Sunny Farms Landfill
Permit Number: P0125384
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EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	Open flare emissions: 497.2 lbs/hr, as a 24-hour daily average, during periods of startup, shutdown and maintenance when only one of the two H2S control system trains is operational; and 870 lbs/hr, as a 24-hour daily average, during periods of startup, shutdown and maintenance of the H2S	OAC rule 3745-31-10 through 20 PTI P0128797	N	Y	Y	Y	Y	N	N	N	ET: M/R/Rp are sufficient to demonstrate compliance.



Statement of Basis
 Sunny Farms Landfill
 Permit Number: P0125384
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EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	control system and enclosed flare.										
	Combined emissions: 146.95 tons H2S per rolling 12-month period from the enclosed flare (stack), the 125-foot open flare (stack) and from the landfill surface (fugitive)	OAC rule 3745-31-10 through 20 PT1 PO128797	N	Y	Y	Y	Y	N	N	N	ET: M/R/Rp are sufficient to demonstrate compliance.
	Enclosed flare emissions: 0.20 pound of CO per mmBtu of methane	OAC rule 3745-31-05(A)(3) ORC 3704.03(T)	N	Y	Y	Y	Y	N	N	N	ET: M/R/Rp are sufficient to demonstrate compliance.



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 Sunny Farms Landfill
 Permit Number: P0125384
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EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	gas combusted; 0.06 pound of NOx per mmBtu of methane gas combusted; 17 pounds PM10 per mmdscf of methane gas combusted	PTI P0128797									
	Enclosed flare emissions: Achieve a minimum destruction efficiency of 98% for VOC. Achieve a minimum of 98% conversion of	OAC rule 3745-31-05(A)(3) ORC 3704.03(T) PTI P0128797 OAC rule 3745-31-10 through 20	N	Y	Y	Y	Y	Y	N	N	



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EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	all H2S (contained in the treated LFG) to SO2	PTI P0128797									
	Open flare emissions: 0.37 pound of CO per mmBtu of methane gas combusted 0.068 pound of NOx per mmBtu of methane gas combusted 17 pounds of PM10 per mmdscf of methane gas combusted Achieve a minimum destruction	OAC rule 3745-31-05(A)(3) ORC 3704.03(T) PTI P0128797	N	Y	Y	Y	Y	N	N	N	ET: M/R/Rp are sufficient to demonstrate compliance.



Statement of Basis
 Sunny Farms Landfill
 Permit Number: P0125384
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EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	efficiency of 98% for VOC.										
	Fugitive Landfill Gas Emissions: 4.60 tons fugitive VOC per rolling 12-month period	OAC rule 3745-31-05(A)(3) ORC 3704.03(T) PTI P0128797	N	Y	Y	Y	Y	N	N	N	ET: None normally required for fugitive VOC. Compliance is based on LandGEM calculations, waste acceptance rates, and control efficiencies. M/R/Rp are sufficient to demonstrate compliance.
	Visible emissions restrictions – See comments*	OAC rule 3745-31-05(A)(3) ORC 3704.03(T) PTI P0128797	N	N	Y	Y	Y	N	N	N	<p>Limitations: *Visible fugitive PE from the landfill and construction operations shall not exceed 20% opacity, as a three-minute average and *No visible emissions to the outside air from asbestos-containing waste materials during the on-site transportation, transfer, deposition, or compacting operations</p> <p>ET: M/R/Rp are sufficient to demonstrate compliance. If required, compliance shall be determined through visible emission observations performed in accordance with Method 22 of 40 CFR, Part 60, Appendix A.</p>
	None	OAC Chapter 3745-19	N	N	N	N	N	N	N	Y	Misc: There shall be no violation of Ohio EPA’s open burning regulations at this facility.



Statement of Basis
Sunny Farms Landfill
Permit Number: P0125384
Facility ID: 0374010199

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	Visible emissions restrictions – See comments* Work Practices Asbestos Contingency Plan	40 CFR, Part 61, Subpart M OAC rule 3745-20-05 through 07 OAC rule 3745-31-05(E) PTI P0128797	N	N	Y	Y	Y	N	N	Y	<p>Limitations: *No visible emissions to the outside air from asbestos-containing waste materials during the on-site transportation, transfer, deposition, or compacting operations</p> <p>ET: M/R/Rp are sufficient to demonstrate compliance. If required, compliance shall be determined through visible emission observations performed in accordance with Method 22 of 40 CFR, Part 60, Appendix A.</p> <p>Misc: Requirements for inactive waste disposal sites.</p>
	Work practices	40 CFR, Part 62, Subpart OOO	N	Y	Y	Y	Y	N	N	N	ET: No emissions limitations are established pursuant to this rule and M/R/Rp are sufficient to demonstrate compliance.
	Work practices	40 CFR, Part 63, Subpart AAAA	N	Y	Y	Y	Y	N	N	N	ET: No emissions limitations are established pursuant to this rule and M/R/Rp are sufficient to demonstrate compliance.



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Sunny Farms Landfill**

Facility ID:	0374010199
Permit Number:	P0125384
Permit Type:	Renewal
Issued:	03/18/2022
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Sunny Farms Landfill

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Draft Title V Permit
Sunny Farms Landfill
Permit Number: P0125384
Facility ID: 0374010199

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0374010199
Facility Description: Refuse Systems
Application Number(s): A0062149, A0070801
Permit Number: P0125384
Permit Description: Title V renewal for a solid waste and C&DD landfill, railcar unload building and solid waste and asbestos landfill.
Permit Type: Renewal
Issue Date: 03/18/2022
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0117316

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

Sunny Farms Landfill
12500 West County Road 18
Fostoria, OH 44830

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Laurie A. Stevenson
Director

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	IBR = Incorporation by Reference	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	ID = Identification Number (typically referring to a facility ten-digit ID number)	PM = particulate matter
BACT = Best Available Control Technology	LAER = Lowest Achievable Emission Rate	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	lb(s)/hr = pound(s) per hour	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act (1955, 70, 77, 80)	LDAR = Leak Detection and Repair	ppb = parts per billion
CAAA = Clean Air Act Amendments (1990)	LPG = liquefied petroleum gas/propane	ppm = parts per million
CAM = Compliance Assurance Monitoring	MACT = Maximum Achievable Control Technology	PSD = Prevention of Significant Deterioration
CEM = Continuous Emissions Monitor	MAGLC = Maximum Acceptable Ground Level Concentration	psi = pounds per square inch
CEMS = Continuous Emissions Monitoring System	mg/m ³ = milligrams per cubic meter	psia = pounds per square inch absolute
CFC = chlorofluorocarbon	MM = million	PTE = Potential-to-Emit
CFR = Code of Federal Regulations	MMBtu = million British Thermal Units	PTI = Permit-to-Install
CH ₄ = methane	MON = Miscellaneous Organic Chemical Manufacturing NESHAP	PTIO = Permit-to-Install and Operate
CI = compression ignition	MSDS = Material Safety Data Sheet	PTO = Permit-to-Operate
CO = carbon monoxide	MSW = Municipal Solid Waste	PWR = process weight rate
CO ₂ = carbon dioxide		RACM = Reasonably Available Control Measures
COM = Continuous Opacity Monitor	NAAQS = National Ambient Air Quality Standard	RACT = Reasonably Available Control Technology
DAPC = Division of Air Pollution Control	NESHAP = National Emission Standard for Hazardous Air Pollutants	RATA = Relative Accuracy Test Audit
DO/LAA = District Office/Local Air Agency	NG = natural gas	RTO = regenerative thermal oxidizer
dscf = dry standard cubic foot	ng/m ³ = nanograms per cubic meter	SB265 = Senate Bill 265
EAC = Emissions Activity Category	NH ₃ = ammonia	scfm = standard cubic feet per minute
eDocs = Electronic Documents Database	NMHC = non-methane hydrocarbons	SI = spark ignition
ERAC = Environmental Review Appeals Commission	NMOC = non-methane organic compound	SIP = State Implementation Plan
ESP = electrostatic precipitator	NNSR = Nonattainment New Source Review	SM = Synthetic Minor
EU = Emissions Unit	NO = nitrogen oxide	SO ₂ = sulfur dioxide
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NO ₂ = nitrogen dioxide	SOB = Statement of Basis
FER = Fee Emissions Report	NO _x = nitrogen oxides	SSMP = Startup, Shutdown and Malfunction Plan
FR = Federal Register	NSPS = New Source Performance Standard	T & C = Term and Condition
GACT = Generally Achievable Control Technology	NSR = New Source Review	TDS = total dissolved solids
GHG = greenhouse gases	NTV = Non-Title V	TLV = Threshold Limit Value
gr = grains	O&M = Operation and Maintenance	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	O ₃ = ozone	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	OAC = Ohio Administrative Code	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	OC = organic compound	TSP = total suspended particulates
HAP = hazardous air pollutant	OEPA = Ohio Environmental Protection Agency	VE = visible emissions
HCl = hydrochloride	ORC = Ohio Revised Code	VMT = vehicle miles traveled
HF = hydrogen fluoride	Pb = lead	VOC = volatile organic compound
Hg = mercury	PBR = Permit-By-Rule	WPP = Work Practice Plan
HON = Synthetic Organic Chemical Manufacturing NESHAP	PCB = polychlorinated biphenyl	µg/m ³ = micrograms per cubic meter
hp = horsepower	PE = particulate emissions	
HVLP = high volume, low pressure	PEMS = Predictive Emissions Monitoring System	



Draft Title V Permit
Sunny Farms Landfill
Permit Number: P0125384
Facility ID: 0374010199

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under state law only:
- (1) Standard Term and Condition A. 21., Air Pollution Nuisance
 - (2) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (4) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting for State-Only Requirements
 - (5) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (6) Standard Term and Condition A. 30., Submitting Documents Required by this Permit

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

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

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

- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-

chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

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

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

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

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

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

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

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

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

Effective Date: To be entered upon final issuance

emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

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

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

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.20, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition

A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

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

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

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

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

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a

federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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

4. Risk Management Plans

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

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

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

5. Title IV Provisions

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

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

6. Severability Clause

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

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

7. General Requirements

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

- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01 based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

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

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

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

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

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

and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

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

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

14. Permit Shield

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

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

15. Operational Flexibility

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

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

16. Emergencies

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

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

17. Off-Permit Changes

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

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

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

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

18. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit-to-Install Requirement

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

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

21. Air Pollution Nuisance

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

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

22. Permanent Shutdown of an Emissions Unit

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

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

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

23. Title VI Provisions

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

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

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

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

The permittee shall submit required reports in the following manner:

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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

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

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

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

28. Permit Transfers

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

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

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

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

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

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or



- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Draft Title V Permit
Sunny Farms Landfill
Permit Number: P0125384
Facility ID: 0374010199

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

2. There are no insignificant emissions units with applicable requirements at this facility.

3. The following emissions unit contained in this permit are subject to 40 CFR Part 63, Subpart AAAA: P902. 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.gov> or by contacting the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(A)(1)]

4. The following emissions unit contained in this permit are subject to 40 CFR Part 62, Subparts A and OOO: P902. The complete requirements, including the General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gov> or by contacting the appropriate Ohio EPA District Office or local air agency.

On August 29, 2016, U.S. EPA published 40 CFR Part 60, Subpart Cf, Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills that accepted waste after November 8, 1987, and commenced construction, reconstruction, or modification on or before July 17, 2014. This rule, effective on October 28, 2016, requires OEPA to submit an updated State Plan (under 40 CFR Part 62.8870) to incorporate the updated standards. OEPA is currently updating OAC Chapter 3745-76 to incorporate the requirements of 40 CFR Part 60, Subpart Cf. Once the updates to OAC Chapter 3745-76 are finalized and U.S. EPA approves the updated State Plan under 40 CFR Part 62.8870, the facility will be subject to the requirements of OAC Chapter 3745-76 and will no longer be subject to the requirements of 40 CFR Part 62, Subpart OOO.

[OAC rule 3745-77-07(A)(1)]



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C. Emissions Unit Terms and Conditions

1. F002, Plant Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Unpaved roadways and parking areas

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 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.	ORC 3704.03(T) (PTI P0107591, issued January 19, 2012)	There shall be no visible PE from the unpaved roadways and parking areas, except for a period of time not to exceed three minutes during any 60-minute observation period. There shall be no visible PE from the paved roadways and parking areas, except for a period of time not to exceed one minute during any 60-minute observation period. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)a through b)(2)f.]
b.	OAC rule 3745-17-07(B)(1)	See b)(2)g.
c.	OAC rule 3745-17-08(B)	See b)(2)h.

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on all roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water or other suitable dust suppression chemicals, at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the



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permittee from employing other equally-effective control measures to ensure compliance.

- b. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- c. Any unpaved roadway or parking area, which during the term of this permit takes the characteristics of a paved surface due to the application of certain types of dust suppressants, shall remain subject to the visible emission limitation for unpaved roadways and parking areas.
- d. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, 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.
- e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 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 best available technology requirements of ORC 3704.03(T).
- g. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- h. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of all roadways and parking areas in accordance with the following frequencies:

Roadways and Parking Areas:	Minimum Inspection Frequency:
All	Once per day of operation

[OAC rule 3745-77-07(C)(1) and PTI P0107591]

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended.

[OAC rule 3745-77-07(C)(1) and PTI P0107591]

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

The information required in d)(3)d shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(C)(1) and PTI P0107591]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any of the following:
- 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.

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

[OAC rule 3745-77-07(C)(1) and PTI P0107591]

f) Testing Requirements

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

a. Emission Limitation:

There shall be no visible PE from unpaved roadways and parking areas except for a period of time not to exceed 3 minutes during any 60-minute observation period.

There shall be no visible PE from paved roadways and parking areas except for a period of time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitations listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

[OAC rule 3745-77-07(C)(1) and PTI P0107591]

g) Miscellaneous Requirements

- (1) None.

2. F003, Railcar Unload Building

Operations, Property and/or Equipment Description:

Railcar unloading transfer station of construction and demolition debris

- 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) b)(1)c.; b)(1)f.; b)(2)a.; b)(2)b.; b)(2)e. through b)(2)g.; c)(1); c)(2); d)(1) through d)(3); e)(1) through e)(4); f)(1); and g)(1).
- 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)(a)(ii) (PTI P0131385, issued December 29, 2021)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 do not apply to the particulate matter less than 10 microns in size (PM ₁₀), emissions from this air contaminant source since the potential to emit (PTE) is less than 10 tons per year, taking into account the voluntary restrictions under b)(1)b.
b.	OAC rule 3745-31-05(F) (PTI P0131385, issued December 29, 2021)	0.98 ton fugitive particulate matter less than 10 microns (PM ₁₀)/year There shall be no visible particulate emissions from the egress points serving the building enclosure except for six minutes during any sixty-minute period. There shall be no visible particulate emissions from the outdoor railcar cleanup operations except for six minutes during any sixty-minute period. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust to the extent that the above visible emissions limitation is met [See b)(2)d. through b)(2)e.]
c.	OAC rule 3745-17-07(B)(1)	This emissions unit is exempt from the visible particulate emission limitations



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-08(B)	The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).
e.	OAC rule 3745-15-07	See g)(1)

(2) Additional Terms and Conditions

- a. The following materials are permitted to be handled at this solid waste transfer station:
 - i. Municipal Solid Waste (MSW);
 - ii. Construction and Demolition Debris (C&DD);
 - iii. Non-toxic fly ash and/or bottom ash;
 - iv. POTW sludge; and
 - v. Category I non-friable Asbestos-Containing Material (ACM).

The materials permitted above do not exempt the permittee from complying with the rules and regulations of the Ohio EPA Division of Solid and Infectious Waste and the Division of Hazardous Waste.

- b. All materials shall be inspected and all shipping papers reviewed prior to unloading to ensure no undesirable materials are included in the shipment. No Regulated Asbestos-Containing Materials (RACM), hazardous wastes, infectious wastes, materials contaminated with radioactive materials, or materials contaminated with PCBs shall be handled in this emissions unit.

[OAC rule 3745-31-05(F)]

- c. The permittee has requested the voluntary emission limitations and restrictions established by this rule in order to avoid the Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a). It shall be noted that the emissions limitations and control requirements established pursuant to OAC rule 3745-31-05(F) are not federally enforceable.
- d. The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:

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- i. unloading of materials from railcars with an excavator and subsequent loading of materials into trucks;
- ii. any other miscellaneous material handling operations inside the railcar unloading building (i.e. handling of material that was spilled during unloading and loading operations, etc.); and
- iii. outdoor railcar cleaning operations following the unloading of materials inside the building.

[OAC rule 3745-31-05(F)]

- e. In order to minimize the fugitive dust generated from the above material handling operations and to ensure compliance with the visible emission limitations:
 - i. The material handling operations identified in b)(2)d.i. and b)(2)d.ii. above shall be contained within a building enclosure. Two ends of the enclosure may be open to allow the railcars and trucks to enter and exit the enclosure. Another opening may be permitted to allow the flexibility the excavator may require to operate. The enclosure shall be designed, built, and operated to minimize the escape of fugitive dust from the enclosure.
 - ii. The permittee shall ensure that the unloading of materials from the rail cars is performed inside the building enclosure and the subsequent loading of materials into trucks shall be done in a manner that will minimize the drop height of the materials.
 - iii. The permittee shall install, operate and maintain a mister system with spray nozzles to control fugitive emissions. At a minimum, the spray nozzles located under the first and second rail unloading platforms and at the entrance and exit doors. The mister system shall also be installed with heat trace to prevent freezing.
 - iv. The permittee shall ensure that any material remaining in the railcar is adequately wet prior to performing any subsequent cleaning operations outside of the building.
 - v. If during the handling of any load, the material becomes airborne, the material shall be watered or sufficiently treated, as necessary, to minimize visible particulate emissions of fugitive dust.

Nothing in the above paragraphs shall prohibit the permittee from employing other suitable control measures at sufficient treatment frequencies to ensure compliance.

[OAC rule 3745-31-05(F)]

- f. For purposes of federal enforceability, the uncontrolled potential to emit of this emissions unit was calculated to be 17.79 tons fugitive PM₁₀.



- g. The uncontrolled PTE was calculated by multiplying an emission factor of 0.05 pounds PE/ton material processed (from RACM document, pg. 2-72, 9/1980) by a maximum annual material processing rate of 5,475,000 tons* and then dividing by 2,000 pounds/ton. The PM10 emission rate was estimated by using a derived particle size multiplier of 0.13 pounds PM₁₀/pound PE from AP-42 Chapter 11.9.

*The annual material processing rate of 5,475,000 tons was determined by multiplying the maximum total annual waste receipt rate of 2,737,500 tons by 2 to account for both loading and unloading operations.

c) Operational Restrictions

- (1) The maximum daily material receipt rate for this emissions unit shall not exceed 7,500 tons.

[OAC rule 3745-77-07(A)(1) and PTI P0131385]

- (2) The permittee shall operate a mister system that meets the following requirements:
 - a. Spray nozzles shall be located at the first railcar unload platform and operated as needed to minimize the visible particulate of fugitive dust; and
 - b. Spray nozzles shall be located at the second railcar unload platform and operated as needed to minimize the visible particulate of fugitive dust; and
 - c. Spray nozzles shall be located at the entrance and exit doors and operated as needed to minimize the visible particulate of fugitive dust.

[OAC rule 3745-77-07(A)(1) and PTI P0131385]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records for this emissions unit of the total material received, in tons per day, for each calendar day.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(F) and PTI P0131385]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the following areas:
 - a. The egress points (i.e., building windows, doors, roof monitors, etc.) serving the building that encloses the railcar unloading operation; and
 - b. The railcar cleanup operation.

The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- c. The color of the emissions;



- d. The total duration of any visible emissions incident; and
- e. Any corrective actions taken to eliminate the visible emissions.

The above records shall be kept separately for the areas identified in d)(2)a. and d)(2)b.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(F) and PTI P0131385]

- (3) The permittee shall maintain daily records that document any time periods when the permittee was unable to meet control measures outlined in b)(2)e. and c)(2) above.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(F) and PTI P0131385]

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.

[OAC rule 3745-77-07(C)(1) and PTI P0131385]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedance of the daily material throughput restriction of 7,500 tons.

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

[OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(F) and PTI P0131385]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. All days during which any visible emissions of fugitive dust were observed from:
 - i. The egress points (i.e., building windows, doors, roof monitors, etc.) serving the building that encloses the railcar unloading operation; and
 - ii. The railcar cleanup operation; and

- b. Describe any corrective actions taken to eliminate the visible emissions.

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

[OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(F) and PTI P0131385]

- (4) The permittee shall notify the Director (appropriate District Office or local air agency) of any time periods during which the permittee was unable to meet the control measures required in b)(2)e. and c)(2) above. The notification shall be submitted within 30 days after the event occurs.

This notification does not exempt the permittee from the control equipment malfunction and scheduled maintenance requirements of OAC rule 3745-15-06.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(F) and PTI P0131385]

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:

0.98 ton fugitive PM₁₀/year

Applicable Compliance Method:

Compliance with the fugitive PM10 emission limitation shall be determined using an emissions factor of 0.05 pounds PE/ton material processed (from RACM document, pg. 2-72, 9/1980).

This emission limit was established based on the following:

- i. There is a maximum of 5,475,000 tons material processed through the emissions unit per year. [The annual material processed through this emissions unit was estimated by multiplying the maximum daily throughput of 7,500 tons by 365 days/year and assuming that all of the material is handled two times to account for both the railcar unloading and subsequent truck loading operations.]
- ii. 90% of the total material processed through the emissions unit is handled within the building enclosure equipped with a wet suppression system.
- iii. The building enclosure and wet suppression system is capable of controlling fugitive emissions by 95%.
- iv. 10% of the total material processed through the emissions unit is handled during the railcar cleanup operation.
- v. The water carryover from the wet suppression system controls 90% of the fugitive emissions from the railcar cleanup operation.
- vi. A derived particle size multiplier of 0.13 pounds PM₁₀/pound PE from AP-42 Chapter 11.9 was used to estimate the PM₁₀ emission rate.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(F) and PTI P0131385]

b. Emissions Limitations:

There shall be no visible particulate emissions from the egress points serving the building enclosure except for six minutes during any sixty-minute period.



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There shall be no visible particulate emissions from the outdoor railcar cleanup operations except for six minutes during any sixty-minute period.

Applicable Compliance Method:

Compliance with the visible emissions limitations shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

[OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(F) and PTI P0131385]

g) Miscellaneous Requirements

- (1) In the event of the receipt of odor complaints concerning this facility by the Northwest District Office, such that the facility needs to be evaluated to determine whether it is causing, permitting, or maintaining a public nuisance, the facility may be required to perform a measurement and characterization of the air contaminants being emitted at the facility. The results of the assessment will be used to evaluate any measures that the facility may need to employ to control the odors.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-15-07 and PTI P0131385]

3. P902, Solid Waste/Asbestos Landfill

Operations, Property and/or Equipment Description:

Asbestos, municipal solid waste (MSW) and construction and demolition debris (C and DD) landfill operations

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) b)(1)h., b)(1)i., b)(1)j., b)(1)m., b)(2)m., b)(2)n., b)(2)o., b)(2)p., b)(2)q., b)(2)x., d)(19), d)(20), d)(21), d)(23), d)(24), d)(25), d)(26), d)(27), e)(5), e)(6), e)(7), e)(8), e)(13), e)(14), e)(15), g)(1) and g)(3).

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 3745-31-10 through 20 (PTI P0128797, issued December 1, 2021)	<p><u>Sulfur Dioxide (SO₂) Emissions:</u> 337.6 tons per rolling 12-month period [See b)(2)a.]</p> <p><u>Hydrogen Sulfide (H₂S) emissions:</u> 146.95 tons per rolling 12-month period [See b)(2)a.]</p> <p>See b)(2)b.</p>
b.	ORC 3704.03(T) and OAC rule 3745-31-05(A)(3) (PTI P0128797, issued December 1, 2021)	<p>Best Available Technology (BAT) for:</p> <p><u>Flare emissions:</u> See b)(2)c. for carbon monoxide (CO), nitrogen dioxide (NO_x), particulate matter 10 microns or less is size (PM₁₀), and volatile organic compounds (VOC)</p> <p>See b)(2)e. for SO₂</p> <p><u>Fugitive Landfill Gas Emissions:</u> 4.60 tons fugitive VOC per rolling 12-month period [See b)(2)d.]</p> <p><u>Fugitive Particulate Emissions:</u> Visible fugitive particulate emissions (PE) from the landfill and construction</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>operations shall not exceed 20% opacity, as a three-minute average. [See b)(2)g. through b)(2)i.]</p> <p>There shall be no visible emissions to the outside air from asbestos-containing waste materials during the on-site transportation, transfer, deposition, or compacting operations. [See b)(2)p.]</p>
c.	<p>40 CFR Part 62, Subpart OOO (40 CFR 62.16710 – 16730)</p> <p>(In accordance with 40 CFR 62.16711, this facility is a municipal solid waste landfill that has accepted waste since November 8, 1987 and is an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³) and has estimated uncontrolled emissions equal to or greater than 34 Mg/yr NMOC)</p>	See b)(2)t., b)(2)u., c)(4), d)(28), e)(16) and f)(5)
d.	40 CFR Part 62, Subpart A (40 CFR 62.01 – 13)	General Provisions [See b)(2)v.]
e.	<p>40 CFR Part 63, Subpart AAAA (40 CFR 63.1930 – 1990)</p> <p>(In accordance with 40 CFR 63.1930 this facility is a municipal solid waste landfill that has accepted waste since November 8, 1987 and is an area source landfill that has a design capacity equal to or greater than 2.5 Mg and 2.5 million m³ and has estimated uncontrolled emissions equal to or greater than 50 Mg/yr NMOC)</p>	See b)(2)w., c)(5), d)(29) and e)(17)
f.	40 CFR Part 63, Subpart A (40 CFR 63.1 – 16)	Table 1 to Subpart AAAA of 40 CFR Part 63 – Applicability of NESHAP General Provisions to Subpart AAAA show which parts of the General Provisions in 40 CFR 63.1 – 16 apply.
g.	40 CFR 61.140 et seq. [NESHAP Subpart M]	See b)(2)j. through b)(2)l.
h.	OAC rules 3745-20-05, 20-06, and 20-07	See b)(2)n. through b)(2)p.; d)(19) through d)(21); and e)(5) through e)(8), and e)(13).

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
i.	OAC rule 3745-31-05(E) (PTI P0128797, issued December 1, 2021)	See b)(2)q. and b)(2)y.
j.	ORC 3704.03(F) and OAC rule 3745-114-01	See d)(23) through d)(26) and e)(14).
k.	OAC rule 3745-17-07(B)(1)	See b)(2)r.
l.	OAC rule 3745-17-08(B)	See b)(2)s.
m.	OAC Chapter 3745-19	See g)(3)

(2) Additional Terms and Conditions

a. The permittee shall employ Best Available Control Technology (BACT) for the control of H₂S and SO₂ emissions from this emissions unit. BACT has been determined to be the use of a landfill gas collection and control system (GCCS) that meets the following design and operational standards:

i. In order to control the fugitive H₂S emissions, an active landfill gas (LFG) collection system shall be operated and maintained in accordance with the approved Landfill Gas Collection and Control System - Maintenance, Monitoring, and Recordkeeping Plan (MMRP). (last revised 06/15/2021*) and subsequently approved revisions [See d)(4)].

The following sections of the MMRP shall be considered as part of the federally enforceable BACT requirements:

- (a) Section 1.2: Landfill GCCS description
- (b) Section 1.3: Regulatory Status
- (c) Section 2.2: Wellheads
- (d) Section 2.3: Lateral Piping
- (e) Section 3.1: Wellfield Operating Standards
- (f) Section 4.2: Surface Emission Monitoring Program
- (g) Those applicable monitoring, recordkeeping and reporting requirements in Section 6: Recordkeeping, Data Evaluation and Reporting used to demonstrate compliance with the sections outlined in b)(2)a.i.(a) through (f) above.

*Note: The portions of the MMRP that address the maintenance, monitoring and recordkeeping of the H₂S treatment system and enclosed flare are effective upon startup of the H₂S treatment system.

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- ii. In order to control SO₂ and H₂S emissions from collected gases, all collected landfill gases are vented to an H₂S control system designed and operated to reduce H₂S concentrations to the following, except during periods of startup, shutdown, and maintenance:
 - (a) For collected LFG with an H₂S concentration greater than 10,000 ppmv, the control system shall achieve a minimum of 98% reduction in H₂S concentration (by volume) in the untreated LFG;

AND
 - (b) For collected LFG with an H₂S concentration equal to, or less than 10,000 ppmv, the control system shall achieve a maximum outlet concentration of H₂S (by volume) no greater than 200 ppmv.
- iii. All LFG treated in accordance with the control requirements in b)(2)a.ii. above shall be vented to an enclosed flare designed and operated to meet the following requirements:
 - (a) Achieve a minimum of 98% conversion of all H₂S (contained in the treated LFG) to SO₂.
 - (b) Designed and operated with no visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
 - (c) During H₂S control system maintenance periods when one H₂S removal train is offline for maintenance, LFG shall be vented to the remaining operational H₂S removal train to the maximum extent practical and the treated LFG vented to the enclosed flare. The remaining untreated LFG shall be vented to the 125-foot open flare.
 - (d) Maintenance downtime for each H₂S removal train shall not exceed 14 days per calendar year. At least one H₂S removal train shall be in operation at all times, except when the enclosed flare is down for maintenance.
 - (e) If the enclosed flare must be brought down for maintenance, then all collected LFG shall be vented to the 125-foot open flare. Enclosed flare maintenance down time shall not exceed 2 days per calendar year.
- iv. The 125-foot open flare shall be designed and operated in accordance with the provisions of 40 CFR 60.756(c) of NSPS Subpart WWW and 60.18 the NSPS general provisions for control devices.
- v. SO₂ emissions from the enclosed flare shall not exceed the following:
 - (a) 35.5 lbs/hr, as a 24-hour daily average, during normal operations (when both H₂S control system trains are operational); and

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- (b) 20.5 lbs/hr, as a 24-hour daily average when only one of the two H₂S control system trains is operational.

It should be noted that the H₂S control system will be offline during all periods of time when the enclosed flare is down for maintenance.

- vi. SO₂ emissions from the open 125-foot flare shall not exceed the following:
 - (a) 497.2 lbs/hr, as a 24-hour daily average, during periods of startup, shutdown and maintenance when only one of the two H₂S control system trains is operational; and
 - (b) 870 lbs/hr, as a 24-hour daily average, during periods of startup, shutdown and maintenance of the H₂S control system and enclosed flare.

It should be noted that the H₂S control system will be offline during all periods of time when the enclosed flare is down for maintenance.

- vii. The combined H₂S emissions from the enclosed flare (stack), the 125-foot open flare (stack) and from the landfill surface (fugitive) shall not exceed 146.95 tons per rolling 12-month period.

- b. The following is for informational purposes only: This permitting action (PTI P0128797) is establishing BACT emissions limitations and associated terms and conditions, as requested by the permittee, in order to fulfill requirements listed in the state Consent Decree, case number, 19cv0224.

- c. In addition to the BACT requirements specified above, the enclosed flare shall be designed and operated to meet the following BAT requirements pursuant to ORC 3704.03(T) and OAC rule 3745-31-05(A)(3):

- i. 0.20 pound of CO per mmBtu of methane gas combusted;
- ii. 0.06 pound of NO_x per mmBtu of methane gas combusted;
- iii. 17 pounds PM₁₀ per mmdscf of methane gas combusted; and
- iv. Achieve a minimum destruction efficiency of 98% for VOC.

The 125-foot open flare shall be designed and operated to meet the following requirements:

- v. 0.37 pound of CO per mmBtu of methane gas combusted;
- vi. 0.068 pound of NO_x per mmBtu of methane gas combusted;
- vii. 17 pounds PM₁₀ per mmdscf of methane gas combusted; and
- viii. Achieve a minimum destruction efficiency of 98% for VOC.

- d. The VOC emission limitation represents the VOC portion of the nonmethane organic compound (NMOC) emission which are not collected by the GCCS and thus are considered fugitive. For the purpose of this permit and federal enforceability, VOC emissions have been determined by applying the AP-42 Chapter 2.4 (11/98) conversion rate of 39% to the predicted NMOC emission rate from the Landfill Gas Emission Model (LandGEM), plus a 15% safety factor. An NMOC emission limit was not established by this rule because there is not an established national ambient air quality standard (NAAQS) associated with NMOC.
- e. BAT requirements include compliance with the SO₂ BACT requirements established in accordance with OAC rules 3745-31-10 through 3745-31-20.
- f. The following landfill fugitive dust operations/sources are covered by this permit and subject to the above requirements:
 - i. daily cover handling and placement;
 - ii. waste handling/dumping at the working face;
 - iii. spreading, grading and compaction;
 - iv. soil transport/construction (dirt) roadways; and
 - v. storage pile activities.
- g. The permittee shall employ best 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 permittee's permit application, the permittee has committed to treat with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance.
- h. The above-mentioned control measures shall be employed if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.

Implementation of the control measures shall not be necessary for fugitive dust sources which are 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.
- i. The facility can accept for disposal any regulated asbestos-containing material (ACM) as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141; and/or in Chapter 20 of the Ohio Administrative Code for Asbestos Emission Control, OAC rule 3745-20-01(B); or in any subsequent revisions to either rule. Regulated asbestos-containing material is defined to include:

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- i. Friable asbestos material;
 - ii. Category I nonfriable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading; or
 - iii. 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.
- j. The permittee is subject to the requirements established in 40 CFR 61.140 et seq. (NESHAP, Subpart M – National Emission Standard for Asbestos). The requirements of this rule are less stringent or equivalent to the requirements established in accordance with OAC rules 3745-20-05 through 3745-20-07, with the exception of the reporting requirement specified in e)(9).
- k. The permittee shall comply with the applicable visible emissions limitation and additional restrictions required under 40 CFR Part 61, Subpart M, including the following sections:

61.154(a); or	Visible emission restriction.
61.154(c); or	Daily cover or dust suppressant requirements.
61.154(d); and	Alternative emission control method.
61.154(b)	Natural barrier, sign, and/or fencing requirements.

- l. Each owner or operator of an active asbestos waste disposal site that receives waste that contains asbestos-containing material shall comply with the following:
- i. There shall be no visible emissions to the outside air from asbestos-containing waste materials during the on-site transportation, transfer, deposition, or compacting operations.
 - i. Deposition and burial operations shall be 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.
 - ii. As soon as practicable after deposition of the asbestos-containing waste materials, but no later than at the end of each operating day, the asbestos-containing waste material deposited at the site during the operating day shall be covered with at least twelve (12) inches of compacted nonasbestos-containing material. Alternatively, an owner or operator of an active waste disposal site may apply for approval of the director to utilize alternative control methods to bind dust, control wind erosion, or convert asbestos to nonfriable forms.
 - iii. During the unloading, deposition, burial, and initial compaction of asbestos-containing waste materials, the owner or operator of the active waste disposal site shall establish a restricted area adequate to deter the

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unauthorized entry of the general public and any unauthorized personnel from any location with one hundred feet of the operations; and

- iv. Shall display the following information on a sign not less than twenty by fourteen (20 x 14) inches, so that it is visible at all entrances and at intervals of three hundred (300) feet or less along the property line or fencing immediately surrounding the restricted area using letter sizes and styles of a visibility at least equal to the following specifications:
 - (a) One (1) inch sans serif, gothic, or block in the first and second lines; and
 - (b) At least three-fourths (3/4) inch sans serif, gothic, or block in the third line; and
 - (c) Fourteen (14) point gothic in the fourth line; and
 - (d) Spacing between any two lines must be at least equal to the height of the upper of the two lines.

“ASBESTOS WASTE DISPOSAL SITE
DO NOT CREATE DUST
BREATHING ASBESTOS IS
HAZARDOUS TO YOUR HEALTH”

- m. Upon closure of the facility, the owner or operator of the active waste disposal site shall comply with all the provisions of OAC rule 3745-20-07 [See g)(1)].
- n. Pursuant to OAC rule 3745-21-01, an inactive waste disposal site is defined as “any disposal site or portion thereof, which contains asbestos-containing waste materials, but where such material has not been deposited within the past year”. The permittee shall comply with the provisions of OAC rule 3745-20-07 for inactive waste disposal sites [See g)(1)].
- o. The permittee shall develop, implement, and maintain an “Asbestos Disposal Operating Procedures and Spill Contingency Plan” (Asbestos Plan) consisting of:
 - i. Authorized personnel training;
 - ii. Inspection and disposal operating procedures;
 - iii. Non-conforming load response procedures;
 - iv. Accidental disturbance and/or re-excavation of disposed asbestos;

- v. Inventory and maintenance procedures for safety and emissions control equipment;
- vi. Recordkeeping procedures; and
- vii. Emergency notification procedures.

Authorized personnel shall be knowledgeable in the procedures of the Asbestos Plan. Emissions control equipment shall be available for wetting and containing asbestos in the event of a release or non-conforming load disposal. All equipment required to implement the plan shall be maintained in accordance with good engineering practices to ensure that the equipment is in a ready-to-use condition and in an appropriate location for use. The Asbestos Plan shall be available for inspection at this facility at all times.

- p. The permittee shall develop, implement, and maintain a “Non-Regulated Asbestos Disposal Operating Procedures and Spill Contingency Plan” (Non-Regulated Asbestos Plan) which contains the following, at a minimum:
 - i. Facility policy regarding the acceptance of known or suspected non-regulated ACM;
 - ii. Procedures for handling known or suspected non-regulated ACM in order to prevent the asbestos from becoming friable;
 - iii. Procedures for handling any known or suspected non-regulated ACM that becomes friable due to landfilling activities;
 - iv. Procedures for handling any accidental disturbance and/or re-excavation of known or suspected disposed ACM;
 - v. Recordkeeping procedures regarding the disposal and location of known or suspected non-regulated ACM; and
 - vi. Emergency notification procedures.

Authorized personnel shall be knowledgeable in the procedures of the Non-Regulated Asbestos Plan. Emissions control equipment shall be available for wetting and containing asbestos in the event of a release. All equipment required to implement the plan shall be maintained in accordance with good engineering practices to ensure that the equipment is in a ready-to-use condition and in an appropriate location for use. The Non-Regulated Asbestos Plan shall be available for inspection at this facility at all times.

- q. The BAT requirements for the fugitive PE from the on-site transportation, transfer, deposition, or compacting operations of asbestos-containing waste materials has been determined to be compliance with the requirements of OAC rules 3745-20-06 and 3745-20-07.
- r. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

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- s. The facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B)(1).
- t. The permittee shall comply with the applicable requirements under 40 CFR Part 62, Subpart OOO (40 CFR 62.16710 – 16730). At the time of issuance of this permit, an annual emission report as required by §62.16712(b) was submitted to Ohio EPA on 01/07/2021 with a calculated NMOC emission rate greater than 34 Mg per year resulting in emissions unit P902 being subject to the collection and control system requirements outlined in §62.16714(b)(2).
- u. The permittee shall comply with the applicable emission standards and additional requirements under 40 CFR, Part 62, Subpart OOO, including the following sections:

Controlled Landfill: (Greater than 2.5 million Mg by mass and 2.5 million cubic meters by volume and greater than or equal to 34 Mg uncontrolled NMOC emission rate, or Tier 4 SEM shows a surface emission concentration of 500 parts per million methane or greater)	
62.16714(b)(1) through (b)(3)	Timeframe for installation of gas collection and control systems and requirements of active and passive gas collection systems.
62.16714(c)	Control system requirements for collected gas.
62.16714(c)(1)	Open flare requirements in accordance with §60.18.
62.16714(c)(2)	Control system designed and operated to reduce NMOC by 98 weight percent; or when an enclosed combustion device is used for control, to either reduce NMOC by 98 weight percent or reduce the outlet NMOC concentration to less than 20 parts per million by volume, dry basis as hexane at 3% oxygen or less.
62.16714(c)(3)	Route collected gas to treatment system that processes gas for subsequent sale or beneficial use. Venting of treated landfill gas to the ambient air is not allowed.
62.16714(c)(4)	All emissions from any atmospheric vent from the gas treatment system are subject to the requirements of paragraph (b) or (c) of this section. Atmospheric vents located on the condensate storage tank are not part of the treatment system and are exempt from the requirements of paragraph (b) or (c) of this section.
62.16714(e)(1) through (e)(3)	Install a collection and control system as provided in paragraphs (b) and (c) of this section or calculate an initial NMOC emission rate for the landfill using the procedures specified in § 62.16718(a) . The NMOC emission rate must be recalculated annually, except as provided in § 62.16724(c)(3) .

62.16714(f)(1) through (f)(4)	Provisions for capping or removing of collection and control systems.
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- v. 40 CFR Part 62, Subpart A provides applicability provisions, definitions, and other general provisions that are applicable to emissions units affected by 40 CFR Part 62.
- w. The permittee shall comply with the applicable requirements under 40 CFR Part 63, Subpart AAAA (40 CFR 63.1930 – 1990).

The permittee shall comply with the applicable emission limitations and control requirements under 40 CFR Part 63, Subpart AAAA, including the following sections:

63.1945	Compliance Timeframe
63.1950	Termination of compliance requirements
63.1955(a)	Compliance standards for collection and control systems
63.1955(c)	Operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions
63.1964	Compliance with the emissions standards and the operating standards of § 63.1958 of this subpart is required at all times.
63.1965	What is a deviation?
63.1985	When enforces this subpart?
63.1990	Definitions

- x. The H₂S control system involves collected LFG being distributed by use of a piping manifold system to two separate H₂S treatment units operated in a parallel configuration. The treated LFG from each H₂S treatment unit is combined in common piping system prior to the inlet of the enclosed flare. The H₂S concentration from the H₂S control system shall be measured in the manifold piping system in the common piping manifold system after the H₂S control system and prior to the enclosed flare.

The piping manifold system prior to the two H₂S treatment units is also the inlet to the open flare. During periods of startup, shutdown and maintenance of the H₂S control system and/or enclosed flare, the H₂S concentration of the LFG vent to the open flare shall be measured in the common piping manifold system.

- y. In order to control the fugitive H₂S emissions, an active landfill gas (LFG) collection system shall be operated and maintained in accordance with the approved Landfill Gas Collection and Control System - Maintenance, Monitoring, and Recordkeeping Plan (MMRP). (last revised 06/15/2021*) and subsequently approved revisions [See d)(4)].



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The following sections of the MMRP shall be considered as part of the state-only enforceable requirements:

- i. Section 4.1: Facility Operations
- ii. Section 4.3: Offsite Self-Monitoring Odor System
- iii. Section 4.4: Off-site Odor Response Actions
- iv. Section 4.5: Meteorological Station
- v. Section 4.6: Communications Program
- vi. Section 5.1: Odor Complaint Receipt
- vii. Section 5.2: Complaint Investigation
- viii. Section 5.3: Odor Complaint Recordkeeping and Reporting
- ix. Those applicable monitoring, recordkeeping and reporting requirements in Section 6: Recordkeeping, Data Evaluation and Reporting used to demonstrate compliance with the sections outlined in b)(2)x.i. through viii. above.

c) Operational Restrictions

- (1) The maximum daily waste receipt rate for this emissions unit shall not exceed 7,500 tons of total waste, including MSW and C&DD material.

[OAC rule 3745-77-07(A)(1) and PTI P0128797]

- (2) The open and enclosed flares shall be operated with a flame present at all times when gases are vented to them.

[OAC rule 3745-77-07(A)(1) and PTI P0128797]

- (3) The presence of a pilot flame shall be monitored using a thermocouple or other equivalent device to detect the presence of a flame. A pilot flame shall be maintained in each flare's pilot light burner. If the pilot flame goes out and does not relight, then an alarm shall sound.

[OAC rule 3745-77-07(A)(1) and PTI P0128797]

- (4) The permittee shall comply with the applicable operational standards required under 40 CFR, Part 62, Subpart OOO, including the following sections:

62.16716(a)(1) and (a)(2)	Gas collection requirements.
62.16716(b)(1) through (b)(3)	Operate with negative pressure at each wellhead, except as provided by rule.
62.16716(c)	Operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius (131

	degrees Fahrenheit) with provisions for a higher operating temperature value at a particular well upon submittal of supporting data and approval by the Administrator.
62.16716(d)	Operate collection system with a methane concentration less than 500 ppm above background at the landfill surface, except as provided by rule.
62.16716(e)	Provisions for inoperable collection or control system.
62.16716(f)	Operate control/treatment system at all times during gas collection.
62.16716(g)	Corrective actions for deviations of the operational requirements.

[OAC rule 3745-77-07(A)(1), 40 CFR Part 62, Subpart OOO and PTI P0128797]

- (5) The permittee shall comply with the applicable emission limitations and control requirements under 40 CFR Part 63, Subpart AAAA, including the following sections:

63.1957	Operate the collection and control device in accordance with the provisions of this rule.
63.1957(a)	Operate the collection system such that gas is collected from each area, cell, or group of cells in the MSW landfill in which solid waste has been in place for 5 years or more if active or 2 years or more if closed or at final grade.
63.1957(b)	Operate the collection system with negative pressure at each wellhead, except as provided by rule.
63.1958(c)(1)	Operate each interior wellhead in the collection system with a landfill gas temperature less than 62.8 degrees Celsius (145 degrees Fahrenheit).
63.1958(c)(2)	Higher operating value demonstration requirements: Submit to the Administrator for approval and include supporting data demonstrating that the elevated parameter neither causes fires nor significantly inhibits anaerobic decomposition by killing methanogens.
63.1958(d)(1)	Operate collection system with a methane concentration less than 500 ppm above background at the landfill surface, except as provided by rule.
63.1958(e)(1)	Operate the system in accordance to § 63.1955(c) such that all collected gases are vented to a control system designed and operated in compliance with § 63.1959(b)(2)(iii) .
63.1958(e)(1)(i) and (ii)	Procedures for when the collection or control system is not operating: The gas mover system must be shut down and valves closed within 1 hour of the system not operating and efforts to repair the system must be initiated and completed in a manner such that downtime is kept to a minimum and the system must be returned to operation.
63.1958(f)	Operate control/treatment system at all times during gas collection.
63.1958(g)	Corrective actions for deviations of the operational requirements.

[OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart AAAA and PTI P0128797]

d) Monitoring and/or Recordkeeping Requirements

- (1) Each continuous H₂S monitoring system with gas chromatography shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 7. At least 45 days before commencing certification testing of the continuous H₂S monitoring system(s) with gas chromatography, the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of H₂S emissions from the CEMS, in units of the applicable standard(s).

For the CEMS located prior to the inlet of the enclosed flare, the plan shall follow the requirements of 40 CFR, Part 60, Appendix F and shall include the requirements to conduct daily calibrations checks, and quarterly cylinder gas audits or relative accuracy audits and to conduct an annual relative accuracy test in units of the standard(s) in accordance with 40 CFR, Part 60, Appendix F.

For the CEMS located at the common piping manifold prior to H₂S treatment system and open flare, the plan shall follow the requirements of 40 CFR, Part 60, Appendix F and shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR, Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR, Part 60, except as noted below.

- a. Conduct a relative accuracy test audit of the H₂S CEM at a minimum frequency of once every three years; and
- b. Conduct cylinder gas audits on the H₂S CEM during each quarter when a relative accuracy test audit is not conducted.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (2) The quality assurance/quality control plan and a logbook dedicated to the continuous H₂S CEMS must be kept on site and available for inspection during regular office hours.

H₂S and continuous emission monitoring system(s) consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (3) The permittee shall install, operate, and maintain equipment to continuously monitor and record H₂S emissions from this emissions unit (in the common piping manifold prior to the H₂S treatment system and open flare and at the inlet of the enclosed flare) in units of the applicable standard(s). The H₂S CEMS shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 7.

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The permittee shall maintain records of all data obtained by each continuous H₂S monitoring system with gas chromatography including, but not limited to:

- a. Emissions of H₂S in parts per million for each cycle time of the analyzer, with no resolution less than one data point per 15-minute period required;
- b. Emissions of H₂S in pounds per hour and tons per rolling 12-month period, in units of the applicable standard(s) in the appropriate averaging period;
- c. Results of quarterly cylinder gas audits;
- d. Results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. Results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. Hours of LFG collection system operation, continuous H₂S monitoring system with gas chromatography, and control equipment (open and/or H₂S control system and enclosed flare);
- g. The date, time, and hours of operation of the LFG collection system without the control equipment (open and/or H₂S control system and enclosed flare) and/or the continuous H₂S monitoring system with gas chromatography;
- h. The date, time, and hours of operation of the LFG collection system during any malfunction of the control equipment (open and/or H₂S control system and enclosed flare) and/or the H₂S CEMS; as well as,
- i. The reason (if known) and the corrective actions taken (if any) for each such event in d)(3)g. and d)(3)h.

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

Prior to the installation of the continuous H₂S monitoring system with gas chromatography, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 7. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous H₂S monitoring system with gas chromatography meets the requirements of Performance Specification 7. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (4) At least 30 days prior to the startup of the H₂S control system, the permittee shall submit to the Ohio EPA Northwest District Office a revised Landfill Gas Collection System – MMRP. Additional revisions to the plan shall be submitted to the Ohio EPA Northwest

District Office. The plan and all subsequent revisions will require written approval from the Ohio EPA prior to implementation.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (5) The revised Landfill Gas Collection System – MMRP shall specify all additional manufacturer specified monitoring parameters (e.x., venturi absorber pressure drop and absorbent solution flow rate) that ensure the proper operation and maintenance of the H₂S treatment system.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (6) The permittee shall collect and analyze the regenerated absorbent solution at least once per day of operation for each individual H₂S treatment unit. Each sample of a regenerated absorbent solution shall be analyzed for pH and oxidation-reduction potential (ORP). The permittee shall maintain records of the results of the analyses for pH and ORP.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (7) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the flow rate (standard cubic feet per minute) for the LFG collection system in the common header pipe supplying LFG to H₂S removal system, LFG flow to each treatment system train and in common header pipe supplying LFG to the enclosed flare from the two H₂S treatment systems. Flow monitor readings shall be reduced to hourly averages. The flow monitors shall be installed and operated in accordance with the provision of 40 CFR 60, Appendix B, Performance Specification 6. The permittee shall maintain records of all recorded hourly flow rate averages.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (8) In order to maintain compliance with the applicable emission limitation(s) associated with the enclosed flare contained in this permit, the acceptable operating temperature within the enclosed flare, excluding periods of startup and shutdown (with the except for periods of maintenance when a backup flare is in use), shall not be less than the lowest temperature measured (in degrees Celsius) during the most recent compliant stack test based on a 3-hour block average. Until compliance testing has been conducted, the enclosed flare shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (9) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the operating temperature within the enclosed flare, (except for periods of startup, shutdown and maintenance when a backup flare is in use). The permittee shall record the operating temperature on continuous basis and reduce to hourly averages and 3-hour block average. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is

conducted and the appropriate temperature range is established to demonstrate compliance. Per the manufacturer specifications, the appropriate minimum temperature shall be 871.1 degrees Celsius (the equivalent to 1600 degrees Fahrenheit), as a 3-hour block average. These records shall be maintained at the facility for a period of no less than 5 years.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

(10) Whenever the 3-hour average operating temperature within the enclosed flare deviates by more 28 degrees Celsius below the minimum operating temperature from the limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. The date and time the deviation began;
- b. The magnitude of the deviation at that time;
- c. The date the investigation was conducted;
- d. The name(s) of the personnel who conducted the investigation; and
- e. The findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. A description of the corrective action;
- g. The date corrective action was completed;
- h. The date and time the deviation ended;
- i. The total period of time (in minutes) during which there was a deviation;
- j. The temperature readings immediately after the corrective action was implemented; and
- k. The name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The minimum temperature limit is effective unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted minimum temperature limit based

upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into the facility's Title V permit by means of a minor permit modification.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (11) The permittee shall maintain records of the following for the LFG collection and control system:
- a. All times during which the LFG collection system was not operational;
 - b. All times during when only a single H₂S treatment unit was in operation and identification of H₂S treatment unit that was not operational;
 - c. All times during which both H₂S treatment units were not operational; and
 - d. All times during which the enclosed flare was not operational.

The records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred. These records shall be maintained at the facility for a period of no less than 5 years.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (12) SO₂ emissions lbs/hr from the open flare and enclosed flare shall be determined using the H₂S CEMS, default concentrations from AP-42 and flow rate monitors. The hourly SO₂ emission rate shall be calculated using the average hourly flow rate (scf) and hourly H₂S averages (ppmv) in accordance with the following equation:

$$\text{SO}_2 \text{ lb/hr} = \sum [(\text{LFG flow rate, in scfm}) \times S \text{ (ppmv)} \times (1.685 \times 10^{-7}) \times (60 \text{ mins/hr}) \times 0.997 \times (1 - \text{MC}_{\text{LFG}} \text{ (\%)})]$$

Where:

LFG: Collected Landfill Gas Flow Rate

S: Sulfur concentration of each sulfur containing compound. Except for H₂S, the concentrations provided below are default concentrations from AP-42 Chapter 2.4 (11/98). Should revised concentration data become available the most current concentrations shall be used.

- Carbon disulfide: 1.16 ppmv;
- Carbonyl sulfide: 0.49 ppmv;
- Dimethyl sulfide: 7.80 ppmv;
- Ethyl mercaptan: 2.27 ppmv;
- Hydrogen sulfide: as measured by H₂S CEMS
- Methyl mercaptan: 2.48 ppmv.

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1.685×10^{-7} : Conversion ppmv to lbs/scf (molecular weight of sulfur/(universal gas constant x temperature) (64.006/(0.7302 x 520))

0.997: 99.7% conversion rate of sulfur compounds to SO₂

MC_{LFG}: Average moisture content of the raw landfill gas. A default percent moisture content of 8.9% (0.089) based on the manufacturer design information shall be used. The actual moisture content of the landfill gas shall be confirmed during the performance testing. The permittee shall revise the moisture content based on the most recent performance testing that demonstrated compliance.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (13) The permittee shall record all periods of time during which a pilot flame is not present or the flare was inoperable whenever landfill gas is being vented to a flare.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (14) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. The calculated emissions of VOC* from fugitive landfill gas emissions, in tons; and
- b. The rolling, 12-month emissions of VOC* from fugitive landfill gas emissions, in tons.

*Emissions of VOC shall be determined in accordance with the emissions calculations approach presented to the Ohio EPA, submitted by the permittee on June 1, 2021, as supplemental information to Permit Application No. M0006635.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (15) The permittee shall maintain the following waste acceptance records:

- a. For each calendar day, the permittee shall record:
 - i. The type and quantity of waste accepted by the landfill [i.e.: MSW, sludge, exempt, C&DD, asbestos, other], in tons per day; and
 - ii. The total daily waste accepted by the landfill [sum of d)(15)a.i.], in tons per day.
- b. For each calendar month, the permittee shall record:
 - i. The total amount of organic waste received, in tons per month; and
 - ii. The total year-to-date amount of organic waste received [sum of d)(15)b.], in tons per year.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

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

Landfill Fugitive Dust Operation/Source	Minimum Inspection Frequency
Waste cover handling and placement	Once during each day of operation
Waste handling/dumping	Once during each day of operation
Grading, grading and compaction	Once during each day of operation
Off-site transport/construction (dirt) roadways	Once during each day of operation
Storage pile activities	Once during each day of operation

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (17) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for fugitive 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 event(s) shall be performed as soon as such event(s) has (have) ended, except if the next inspection is within one week.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (18) 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)(18)d. shall be kept separately for each landfill fugitive dust operation/source listed above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (19) During the handling of asbestos-containing waste materials, the permittee shall check for any visible emissions from the asbestos-containing waste materials during on-site transportation, transfer, unloading, deposition, and compacting of the waste. The presence or absence of any visible emissions from the asbestos-containing waste materials shall be noted in an operations log.

If visible emissions are observed, the permittee shall immediately follow the procedures of the "Asbestos Disposal Operating Procedures and Spill Contingency Plan" and also note the following in the operations log:

- a. The total duration of any visible emission incident; and
- b. Any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1), 3745-20-06 and PTI P0128797]

(20) The owner or operator of a waste disposal site shall maintain waste shipment records for all asbestos-containing waste material received. The waste shipment record shall be legible, complete, signed, and dated by the waste generator and waste disposal site operator as follows:

- a. The waste shipment record shall include the following information:
 - i. The name of the work site or facility where the asbestos-containing waste was generated, the mailing address, and telephone number of the facility owner;
 - ii. The name, mailing address, and telephone number of the owner or operator (waste generator) responsible for handling, packing, marking, and labeling the asbestos-containing waste material;
 - iii. The name, mailing address, telephone number, and site location of the active waste disposal site designated by the generator to receive the asbestos-containing waste material for disposal;
 - iv. The name and address of the local, state, or U.S. EPA regional agency responsible for administering the asbestos NESHAP program;
 - v. A description of the asbestos-containing waste materials included in the waste shipment;
 - vi. The number and type of containers included in the waste shipment;
 - vii. The approximate volume of asbestos-containing waste material included in the waste shipment, in cubic yards;
 - viii. Special handling instructions or additional information relative to the waste shipment the waste generator may specify;
 - ix. A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and governmental regulations;
 - x. The name, address, and telephone number of the transporter;
 - xi. A signature by the transporter to acknowledge receipt of the asbestos-containing waste shipment described by the waste generator in sections d)(20)a.i through d)(20)a.ix. above;

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- xii. A discrepancy indication space to be completed by the owner or operator of the waste disposal site if any improperly contained asbestos waste is observed or if there is any discrepancy in the quantity of asbestos shipped and the quantity of asbestos waste received at the asbestos waste disposal site; and
 - xiii. A signature by the waste disposal site owner or operator to acknowledge receipt of the asbestos-containing waste shipment described by the waste generator in sections d)(20)a.i. through d)(20)a.ix., except as noted in the discrepancy indication space.
- b. Upon receiving the waste shipment, the waste disposal site owner or operator shall:
- i. Sign and date the waste shipment record making note of any improperly contained asbestos-containing waste material or any discrepancy in the quantity or waste received on the discrepancy indication space and provide a copy of the waste shipment record to the transporter for his receipt and records.
 - ii. As soon as possible and no longer than thirty days after receipt of the waste, send the original completed copy of the signed waste shipment record to the waste generator and retain the remaining copy for the waste site disposal record.
 - iii. Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and the quantity actually received, the permittee shall attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within fifteen (15) days after receiving the waste, the permittee shall immediately report the discrepancy in writing to the local, state, or U.S. EPA regional office responsible for administering the asbestos NESHAP program for the disposal site. The permittee shall describe the discrepancy and attempts to reconcile it and submit a copy of the waste shipment records along with the report to Ohio EPA.

If, on the basis of the inspection, the waste material is found to be improperly received, the load shall be disposed of in accordance with the procedures in the "Asbestos Disposal Operating Procedures and Spill Contingency Plan", and the discrepancy shall be noted on the waste shipment record.

If possible, non-conforming loads of suspect friable material shall be detained, or the location of disposal protected from damage, until the appropriate Ohio EPA District Office or local air agency is informed and proved the opportunity to inspect.

[OAC rule 3745-77-07(C)(1), OAC rules 3745-20-05 and 3745-20-06 and PTI P0128797]

- (21) For all asbestos-containing waste material received, the owner or operator of the active waste disposal site shall maintain until closure, records of the location, depth, area, and

quantity, in cubic yards of asbestos-containing waste material, within the disposal site on a map or a diagram of the disposal area.

[OAC rule 3745-77-07(C)(1), 3745-20-06 and PTI P0128797]

- (22) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 61, Subpart M, including the following sections:

61.154(e)(1); 61.154(e)(2); and 61.154(e)(3)	Requirements for waste shipment records.
61.154(e)(4) and 61.154(i)	Record retention and inspection requirements.
61.154(f)	Asbestos placement records.
61.154(g)	Closure requirements.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart M and PTI P0128797]

- (23) The permit-to-install application for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit'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, (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).

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- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., “X” hours per day and “Y” 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):

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

- 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: hydrogen sulfide

TLV (mg/m³): 1.39 (From ACGIH’s “2021 TLVs and BEIs” Book)

Maximum Hourly Emission Rate (lb/hr): 0.81* (combined limit from open and enclosed flare stacks)

Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 0.24

MAGLC (µg/m³): 33.19

Toxic Contaminant: hydrogen chloride

TLV (mg/m³): 2.20 (From ACGIH’s “2021 TLVs and BEIs” Book)

Maximum Hourly Emission Rate (lb/hr): 0.59* (from open and enclosed flare stacks, combined)

Predicted 1-Hour Maximum Ground Level Concentration (µg/m³): 1.504 (combined limit from open and enclosed flare stacks)

MAGLC (µg/m³): 52.38

*The maximum hourly emission rate is based on the worst-case scenario of the predicted 1-Hour Maximum Ground Level Concentration from normal operations and maintenance activities, combined.

The permittee has demonstrated that emissions of hydrogen sulfide and hydrogen chloride, from emissions unit(s) P902, 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).

[PTI P0128797]

- (24) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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 could result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

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- 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 permit-to-install 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.

[PTI P0128797]

- (25) 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.

[PTI P0128797]

- (26) 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.

[PTI P0128797]

- (27) The permittee shall demonstrate compliance with the state-only enforceable requirements of the Landfill Gas Collection and Control System – MMRP by complying with the monitoring and recordkeeping requirements outlined in the sections of the MMRP specified in b)(2)x. above.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (28) The permittee shall comply with the applicable monitoring and recordkeeping standards required under 40 CFR, Part 62, Subpart OOO, including the following sections:

62.16722(a)(1) through (a)(3)	Active gas collection monitoring requirements.
62.16722(b)(1) and (b)(2)	Enclosed combustor monitoring requirements.
62.16722(c)(1) and (c)(2)	Open flare monitoring requirements.
62.16722(d)	Monitoring requirements for control devices other than open flares and enclosed combustors.
62.16722(e)	Provisions for alternate operating and monitoring parameters.
62.16722(f)	Monitoring requirements for surface methane concentrations to demonstrate compliance with the 500 parts per million surface methane operational standard in § 62.16716(d).
62.16722(g)	Maintain and operate all monitoring systems associated with the treatment system in accordance with the site-specific treatment system monitoring plan including use of gas flow rate measuring device and securing the bypass line valve.
62.16726(a)	Maintain for 5 years records of design capacity report, current amount of solid waste in-place, and year-by-year waste acceptance rate, except as provided by rule.
62.16726(b)(1) through (b)(5)	Gas collection control system recordkeeping requirements.
62.16726(c)(1) through (c)(5)	Keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in § 62.16722 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.
62.16726(d)(1) and (d)(2)	Keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label on each collector that matches the labeling on the plot map; including installation date and location of all newly installed collectors; and the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste

	<p>excluded from collection as provided in § 62.16728(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in § 62.16728(a)(3)(ii).</p>
<p>62.16726(e)(1) through (e)(6)</p>	<p>Keep for at least 5 years up-to-date, readily accessible records of:</p> <p>All collection and control system exceedances of the operational standards in § 62.16716, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.</p> <p>Each wellhead temperature monitoring value of 55 degrees Celsius (131 degrees Fahrenheit) or above, each wellhead nitrogen level at or above 20 percent, and each wellhead oxygen level at or above 5 percent.</p> <p>For any root cause analysis for which corrective actions are required in § 62.16720(a)(3) or § 62.16720(a)(4), keep a record of the root cause analysis conducted, including a description of the recommended corrective action(s) taken, and the date(s) the corrective action(s) were completed.</p> <p>For any root cause analysis for which corrective actions are required in § 62.16720(a)(3)(ii) or § 62.16720(a)(4)(ii), keep a record of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed following the positive pressure reading or high temperature reading, and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates.</p> <p>For any root cause analysis for which corrective actions are required in § 62.16720(a)(3)(iii) or § 62.16720(a)(4)(iii), keep a record of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed following the positive pressure reading or high temperature reading, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates, and a copy of any comments or final approval on the corrective action analysis or schedule from the regulatory agency.</p> <p>Each owner or operator that chooses to comply with the provisions in §§ 63.1958, 63.1960, and 63.1961 of this chapter, as allowed in §§ 62.16716, 62.16720, and 62.16722, must keep records of the date upon which the owner or operator started complying with the provisions in §§ 63.1958, 63.1960, and 63.1961 of this chapter.</p>

62.16726(g)(1) through (g)(9)	Landfill owners or operators seeking to demonstrate that site-specific surface methane emissions are below 500 parts-per-million by conducting SEM under the Tier 4 procedures specified in § 62.16718(a)(6) must keep for at least 5 years up-to-date, readily accessible records of all SEM and information related to monitoring instrument calibrations conducted according to sections 8 and 10 of EPA Method 21 of Appendix A-7 of 40 CFR Part 60.
62.16726(h)	Keep for at least 5 years up-to-date, readily accessible records of all collection and control system monitoring data for parameters measured in § 62.16722(a)(1), (2), and (3).
62.16726(i)	Any records required to be maintained by this subpart that are submitted electronically via the EPA's CDX may be maintained in electronic format.
62.16726(j)	For each owner or operator reporting leachate or other liquids addition under § 62.16724(l), keep records of any engineering calculations or company records used to estimate the quantities of leachate or liquids added, the surface areas for which the leachate or liquids were applied, and the estimates of annual waste acceptance or total waste in place in the areas where leachate or liquids were applied.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 62, Subpart OOO and PTI P0128797]

- (29) The permittee shall comply with the applicable emission limitations and control requirements under 40 CFR Part 63, Subpart AAAA, including the following sections:

63.1958(d)(2)	Conduct surface testing using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in § 63.1960(d). Conduct surface testing at all cover penetrations. Thus, the owner or operator must monitor any cover penetrations that are within an area of the landfill where waste has been placed and a gas collection system is required. (Determine the latitude and longitude coordinates of each exceedance using an instrument with an accuracy of at least 4 meters. The coordinates must be in decimal degrees with at least five decimal places.
63.1959(a)(1)	NMOC calculation procedures: NMOC emission rate.
63.1959(b)(2)(ii)	Collection system: Install and start up a collection and control system that captures the gas generated within the landfill as required by paragraphs (b)(2)(ii)(B) or (C) and (b)(2)(iii) of this section within 30 months after NMOC calculations demonstrate the NMOC emission rate is greater than 50 Mg/yr.
63.1959(b)(2)(iii)	Control system: Route all the collected gas to a control system that complies with the requirements in either paragraph (b)(2)(iii)(A), (B), or (C) of this section.
63.1959(c)	NMOC Calculations after startup of collection and control system: Calculate the NMOC emission rate for purposes of

	determining when the system can be capped, removed, or decommissioned as provided in § 63.1957(b)(3) , using Equation 3.
63.1960(a)(1)	Compliance provisions: Calculate maximum gas generation flow rate, to determine compliance with the gas collection system requirements in § 63.1959(b)(2)(ii).
63.1960(a)(2)	Compliance provisions: Determine sufficient density of gas collectors, design a system of vertical wells, horizontal collectors, or other collection devices capable of controlling and extracting gas from all portions of the landfill sufficient to meet all operational and performance standards.
63.1960(a)(3)	Compliance provisions: Monthly monitoring of gauge pressure in the gas collection header applied to each individual well. Alternative timeline for correcting the exceedance may be submitted to the Administrator for approval. If a positive pressure exists, follow the procedures as specified in § 60.755(a)(3), except as provided by rule.
63.1960(a)(4)	Where an owner or operator seeks to demonstrate compliance with the temperature and nitrogen or oxygen operational standards in introductory paragraph § 63.1958(c) , for the purpose of identifying whether excess air infiltration into the landfill is occurring, the owner or operator must follow the procedures as specified in § 60.755(a)(5) of this chapter , except as provided by rule.
63.1960(b)	Install each well or design component as specified in the approved design plan no later than 60 days after the date on which the initial solid waste has been in place for a period of 5 years or more if active; or 2 years or more if closed or at final grade.
63.1960(c)(1) through (c)(5) and (f)	Surface Emissions Monitoring Provisions: Monitoring requirements for surface methane concentrations to demonstrate compliance with the 500 parts per million surface methane operational standard in § 62.16716(d).
63.1960(d)	Instrumentation specifications and procedures for surface emission monitoring devices.
63.1960(e)	The provisions of this subpart apply at all times, including periods of SSM. During periods of SSM, comply with the work practice requirement specified in § 63.1958(e) in lieu of the compliance provisions in § 63.1960.
63.1961(a)(1) through (a)(4)	Each owner or operator seeking to comply with § 63.1959(b)(2)(ii)(B) for an active gas collection system must install a sampling port and a thermometer, other temperature measuring device, or an access port for temperature measurements at each wellhead and measure the gauge pressure, in the gas collection header, the nitrogen or oxygen concentration in the landfill gas, and the temperature of the landfill gas on a monthly basis.

63.1961(a)(5) and (a)(6)	<p>Unless a higher operating temperature value has been approved by the Administrator, initiate enhanced monitoring at each well with a measurement of landfill gas temperature greater than 62.8 degrees Celsius (145 degrees Fahrenheit), as specified in § 63.1961(a)(5)(i) through (ix).</p> <p>For each wellhead with a measurement of landfill gas temperature greater than or equal to 73.9 degrees Celsius (165 degrees Fahrenheit), annually monitor temperature of the landfill gas every 10 vertical feet of the well. This temperature can be monitored either with a removable thermometer, or using temporary or permanent thermocouples installed in the well.</p>
63.1961(b)(1) and (b)(2) and 63.1975	Enclosed combustor (flare) monitoring requirements: Calculate 3-hour block averages according to §§ 63.1983(b)(2)(i) and 63.1983(c)(1)(i) and the data collected during the events listed in paragraphs (a) through (d) of § 63.1975 are included in any average computed under this subpart
63.1961(c) and (d)	Monitoring requirements for control devices other than enclosed combustors.
63.1961(e) and (g)	Provisions for alternate operating and monitoring parameters.
63.1962	<p>Specifications for active collection systems: Site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas using the following procedures unless alternative procedures have been approved by the Administrator as provided in § 63.1981(d)(2) and (3).</p> <p>Construct the gas collection devices using the equipment or procedures as provided in § 63.1962(b)(1) through (b)(3).</p> <p>Convey the landfill gas to a control system in compliance with § 63.1959(b)(2)(iii) through the collection header pipe(s). The gas mover equipment must be sized to handle the maximum gas generation flow rate expected over the intended use period of the gas moving equipment using the following procedures provided in § 63.1962(c)(1) and (c)(2).</p>
63.1983(a)	Maintain for 5 years records of design capacity report, current amount of solid waste in-place, and year-by-year waste acceptance rate, except as provided by rule.
63.1983(b)(1) through (b)(5)	Gas collection control system recordkeeping requirements.
63.1983(c)(1) through (c)(8)	Keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in § 63.1959 as well as up-to-date, readily accessible records for periods of operation during which the parameter

	boundaries established during the most recent performance test are exceeded.
63.1983(d)(1) and (d)(2)	Keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label on each collector that matches the labeling on the plot map; including installation date and location of all newly installed collectors; and the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection as provided in § 63.1962(a)(3)(i) as well as any nonproductive areas excluded from collection as provided in § 63.1962(a)(3)(ii) .
63.1983(e)(1) through (e)(5)	<p>Keep for at least 5 years up-to-date, readily accessible records of:</p> <p>All collection and control system exceedances of the operational standards in § 63.1958, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.</p> <p>Each wellhead temperature monitoring value of 55 degrees Celsius (131 degrees Fahrenheit) or above, each wellhead nitrogen level at or above 20 percent, and each wellhead oxygen level at or above 5 percent, except as provided by rule.</p> <p>For any root cause analysis for which corrective actions are required in § 63.1960(a)(3)(i)(A) or (a)(4)(i)(A), keep a record of the root cause analysis conducted, including a description of the recommended corrective action(s) taken, and the date(s) the corrective action(s) were completed., and the date(s) the corrective action(s) were completed.</p> <p>For any root cause analysis for which corrective actions are required in § 63.1960(a)(3)(i)(C) or (a)(4)(i)(C), keep a record of the root cause analysis conducted, the corrective action analysis, the date for corrective action(s) already completed following the positive pressure reading or high temperature reading, and, for action(s) not already completed, a schedule for implementation, including proposed commencement and completion dates. and a copy of any comments or final approval on the corrective action analysis or schedule from the Administrator.</p>
63.1983(g)	Keep for at least 5 years up-to-date, readily accessible records of all collection and control system monitoring data for parameters measured in § 63.1961(a)(1) through (6).
63.1983(h)	Keep for at least 5 years up-to-date, readily accessible records of landfill gas temperature on a monthly basis as monitored in § 63.1960(a)(4) and records of enhanced monitoring data at each well with a measurement of landfill gas temperature

	greater than 62.8 degrees Celsius (145 degrees Fahrenheit) as gathered in § 63.1961(a)(5) and (6).
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[OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart AAAA and PTI P0128797]

e) Reporting Requirements

(1) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its SO₂ emissions:

- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of SO₂ emissions in excess of any applicable limit specified in this permit. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
- b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:
 - i. The facility name and address;
 - ii. The manufacturer and model number of the continuous H₂S and LFG flow monitors;
 - iii. A description of any change in the equipment that comprises the CEMS, including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. The excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. The total SO₂ emissions for the calendar quarter (tons);
 - vi. The total operating time (hours) of the LFG collection system;
 - vii. The total operating time (hours) of the H₂S CEMS while the LFG collection system was in operation;
 - viii. Results and date of quarterly cylinder gas audits;
 - ix. Unless previously submitted, results and date of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

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- x. Unless previously submitted, the results of any relative accuracy test audit showing the H₂S CEMS out-of-control and the compliant results following any corrective actions;
- xi. The date, time, and duration of any/each malfunction** of the H₂S CEMS, LFG collection system, and/or control equipment (enclosed flare);
- xii. The date, time, and duration of any downtime** of the continuous H₂S monitoring system with gas chromatography and/or control equipment (enclosed flare) while the LFG collection system was in operation; and
- xiii. The reason (if known) and the corrective actions taken (if any) for each event in e)(1)b.xi and e)(1)b.xii.
- xiv. Each report shall address the operations conducted and data obtained during the previous calendar quarter.

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

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

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and each H₂S CEMS:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency.
 - b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:
 - i. The facility name and address;
 - ii. The manufacturer and model number of the continuous H₂S and other associated monitors;
 - iii. A description of any change in the equipment that comprises the H₂S CEMS, including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. The total operating time (hours) of the emissions unit (LFG collection system);

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- v. The total operating time (hours) of the H₂S CEMS while this emissions unit (LFG collection system) was in operation;
- vi. Unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- vii. Unless previously submitted, the results of any relative accuracy test audit showing the continuous total reduced sulfur monitor out-of-control and the compliant results following any corrective actions;
- viii. The date, time, and duration of any/each malfunction** of the H₂S CEMS, emissions unit, and/or control equipment;
- ix. The date, time, and duration of any downtime** of the H₂S CEMS and/or control equipment while the emissions unit was in operation; and
- x. The reason (if known) and the corrective actions taken (if any) for each event in e)(2)b.xi. and e)(2)b.xi.
- xi. Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where the H₂S CEMS has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

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

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. In accordance with the Monitoring and Recordkeeping Requirements established in d)(4) the permittee shall submit quarterly deviation (excursion) reports that identify any of the following:
 - i. Each instance when the approved Landfill Gas Collection System – MMRP was not followed; and
 - ii. Describe any corrective actions taken upon discovering the approved MMRP was not followed.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. In accordance with the Monitoring and Recordkeeping Requirements established in d)(8), d)(9) and d)(10) the permittee shall submit quarterly deviation (excursion) reports that identify any of the following:
 - i. Each period of time (start time and date, and end time and date) when the operating temperature within the enclosed flare was outside of the range specified by the manufacturer and/or outside of the acceptable range established during performance test;
 - ii. Any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the enclosed flare;
 - iii. Each incident of deviation described in e)(4)b.i. or e)(4)b.ii. (above) where a prompt investigation was not conducted;
 - iv. Each incident of deviation described in e)(4)b.i. or e)(4)b.ii. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the enclosed flare into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - v. Each incident of deviation described in e)(4)b.i. or e)(4)b.ii. where proper records were not maintained for the investigation and/or the corrective action(s).
- b. In accordance with the Monitoring and Recordkeeping Requirements established in d)(13), the permittee shall submit quarterly deviation (excursion) reports that identify any of the following:
 - i. All periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.
- c. In accordance with the Monitoring and Recordkeeping Requirements established in d)(17), d)(18) and d)(19), the permittee shall submit quarterly deviation (excursion) reports that identify any of the following:
 - i. 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
 - ii. Each instance when a control measure that was to be implemented as a result of an inspection was not implemented.
- d. In accordance with the Monitoring and Recordkeeping Requirements established in d)(11), the permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - i. All times during which the LFG collection system was not operational;

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- ii. All times during when only a single H₂S treatment unit was in operation and identification of H₂S treatment unit that was not operational;
 - iii. All times during which both H₂S treatment units were not operational; and
 - iv. All times during which the enclosed flare was not operational.
- e. In accordance with the Monitoring and Recordkeeping Requirements established in d)(20), the permittee shall submit quarterly deviation (excursion) reports that identify the following:
- i. All days during which any visible emissions of fugitive dust were observed from asbestos-containing waste materials during on-site transportation, transfer, unloading, deposition, and/or compacting operations; and
 - ii. Describe any corrective actions taken to eliminate the visible emissions.
 - iii. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1), OAC rule 3756-20-06 and PTI P0128797]

- (5) Upon closure of the facility, the owner or operator of the active waste disposal site shall submit a copy of the records of the asbestos waste disposal locations and quantities to the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-20-06 and PTI P0128797]

- (6) The owner or operator of the active waste disposal site shall notify the appropriate Ohio EPA District Office or local air agency, in writing, at least forty-five (45) days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, provide notice of the new start date to the appropriate Ohio EPA District Office or local air agency at least ten (10) working days before excavation begins. In no event shall excavation begin earlier than the date specified in the original notification. Include the following information in the notice:

- a. Scheduled starting and completion dates.
- b. Reason for disturbing the waste.
- c. Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. If deemed necessary, the director may require changes in the emission control procedures to be used.
- d. Location of any temporary storage site and the final disposal site.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-20-06 and PTI P0128797]

- (7) In accordance with the Monitoring and Recordkeeping Requirement specified in d)(20)b.iii., if a discrepancy between the quantity of waste designated on a waste shipment record and the quantity actually received is not resolved within 15 days, the permittee shall immediately report the discrepancy, in writing to the local, state, or U.S. EPA regional office responsible for administering the asbestos NESHAP program for the disposal site. Describe the discrepancy and attempts to reconcile it and submit a copy of the waste shipment records along with the report to Ohio EPA.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-20-05 and PTI P0128797]

- (8) The presence of a significant amount of improperly enclosed or uncovered asbestos-containing waste material, or any asbestos-containing waste material not sealed in leak-tight containers must be reported, in writing, to the local, state, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, to the local, state, or EPA Regional office responsible for administering the asbestos NESHAP program for the disposal site, by the following working day. Submit a copy of the waste shipment record along with the report.

[OAC rule 3745-77-07(C)(1), 40 CFR 61.154(e)(1)(iv) and PTI P0128797]

- (9) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 61, Subpart M, including the following sections:

61.154(e)(1)(iv)	Reporting requirements for discovery of improperly enclosed or uncovered waste.
61.154(e)(3)	Waste shipment record discrepancy report.
61.154(h)	Facility closure report.
61.154(j)	Reporting requirements for excavating or disturbing deposited asbestos waste.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart M and PTI P0128797]

- (10) The permittee shall notify the Northwest District Office of any load of asbestos-containing material which is rejected, or any non-conforming load disposed of in accordance with the “Asbestos Disposal Operating Procedures and Spill Contingency Plan”. Notification shall be provided as soon as possible by telephone contact, followed in writing by the next working day. The written notification shall provide a copy of the waste shipment record (WSR), if available, or when waste is not shipped with a WSR, provide available information concerning vehicle identification, source of the load, a description of the load, nature of discrepancy, and the location of disposal.

[OAC rule 3745-77-07(C)(1), OAC rule 3745-20-06 and PTI P0128797]

- (11) The permittee shall submit, or have submitted, a copy of the “Asbestos Disposal Operating Procedures and Spill Contingency Plan” required in b)(2)o. to the appropriate Ohio EPA District Office or local air agency for approval. Any subsequent revisions to the Plan shall be submitted to the appropriate Ohio EPA District Office or local air agency at the time of the revision.

[OAC rule 3745-77-07(C)(1) OAC rule 3745-20-06 and PTI P0128797]

- (12) The permittee shall submit, or have submitted, a copy of the “Non-Regulated Asbestos Disposal Operating Procedures and Spill Contingency Plan” required in b)(2)r. to the appropriate Ohio EPA District Office or local air agency for approval. Any subsequent revisions to the Plan shall be submitted to the appropriate Ohio EPA District Office or local air agency at the time of the revision.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (13) The permittee shall submit, or have submitted, a copy of the Landfill Gas Collection and Control – Maintenance, Monitoring, and Recordkeeping Plan for the active gas collection and control systems required in b)(2)t. to the appropriate Ohio EPA District Office or local air agency for approval. Any subsequent revisions to the plan shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days of the revision to the previous plan.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (14) 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.

[PTI P0128797]

- (15) The permittee shall submit quarterly deviation (excursion) reports that identify all days during which the facility failed to comply with the monitoring and recordkeeping requirements outlined in the sections Landfill Gas Collection and Control System – MMRP, as specified in b)(2)x. above.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (16) The permittee shall comply with the applicable reporting standards required under 40 CFR, Part 62, Subpart OOO, including the following sections:

62.16724(a)(1) and (a)(2)	Initial design capacity report.
62.16724(c)(1) through (c)(4)	Initial and annual NMOC emission rate reports.
62.16724(d)(1) through (d)(7)	Collection and control system design plan, including any recalculation of NMOC emission rate after Tier 2 NMOC sampling and analysis; and recalculation of NMOC emission rate after determining a site-specific methane generation rate constant (Tier 3).
62.16724(e)(1) and (e)(2)	<p>Revised design plan: The owner or operator who has already been required to submit a design plan under paragraph (d) of this section, or under subpart GGG of this part; 40 CFR Part 60, subpart WWW; or a state plan implementing subpart Cc of 40 CFR Part 60, must submit a revised design plan to the Administrator for approval as follows:</p> <p>At least 90 days before expanding operations to an area not covered by the previously approved design plan.</p> <p>Prior to installing or expanding the gas collection system in a way that is not consistent with the design plan that was submitted to the Administrator according to paragraph (d) of this section.</p>
62.16724(f)	Closure report if ceasing waste acceptance.
62.16724(g)(1) and (g)(2)	Equipment removal report.
62.16724(h)(1) through (h)(7)	Annual report for active gas collection systems.
62.16724(i)(1) through (i)(6)	Initial performance test report.
62.16724(j)(1) and (j)(2)	Electronic reporting requirements.
62.16724(k)(1) and (k)(2)	Corrective action and the corresponding timeline.
62.16724(l)(1) through (l)(10)	Liquids addition: The owner or operator of a designated facility with a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters that has employed leachate recirculation or added liquids based on a Research, Development, and Demonstration permit (issued through Resource Conservation and Recovery Act (RCRA), subtitle D, part 258) within the last 10 years must submit to the Administrator an annual report.
62.16724(m)(1) and (m)(2)	Tier 4 notification for site-specific surface methane emissions below 500 parts per million methane, based on the Tier 4 provisions of § 62.16718(a)(6). The landfill must also include a description of the wind barrier to be used during the SEM.
62.16724(n)(1) and (n)(2)	Notification of meeting Tier 4: Increments of progress
62.16724(o)	Notification of failing to meet an increment of progress.

62.16724(p)	Alternate dates for increments 2 and 3.
62.16724(q)	24-hour high temperature report.

- (17) The permittee shall comply with the applicable emission limitations and control requirements under 40 CFR Part 63, Subpart AAAA, including the following sections:

63.1959(b)(2)	NMOC greater than 50 Mg/yr: Submit a collection and control system design plan prepared by a professional engineer within 1 year. The collection and control system must meet the requirements in paragraphs (b)(2)(ii) and (iii) of this section.
63.1960(f)	Notification in the semi-annual report of each exceedance of the 500-ppm methane concentration
63.1981(a)	Initial design capacity report.
63.1981(b)	Amended design capacity report.
63.1981(c)	NMOC emission rate report, submitted annually.
63.1981(d)	Collection and control system design plan: Submit a plan to the Administrator according to paragraphs (d)(1) through (6) of this section. The collection and control system design plan must be prepared and approved by a professional engineer.
63.1981(e)	Revised design plan.
63.1981(f)	Closure report.
63.1981(g)	Equipment removal report.
63.1981(h)	Semi-annual report.
63.1981(i)	Initial performance test report.
63.1981(j)	Corrective action and corresponding timeline.
63.1981(k)	24-hour high temperature report.
63.1981(l), (m) and (n)	Electronic reporting requirements and Claims of U.S. EPA system outage and force majeure.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart AAAA and PTI P0128797]

- (18) Unless other arrangement 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.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

f) Testing Requirements

- (1) Within 180 days of commencing operation of the H₂S control system specified in b)(2)a.ii., the permittee shall conduct certification tests of the H₂S CEMS located at the inlet to the open flare (prior to the H₂S treatment system and open flare), in units of the applicable standard(s) to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specifications 2 and 7; and ORC section 3704.03(l).

Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA

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District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the H₂S CEMS shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 7; and ORC section 3704.03(I).

The permittee is required to demonstrate ongoing compliance with the SO₂ emission limitations contained in this permit, demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit [See d)(12)].

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (2) Within 180 days of commencing operation of the H₂S control system specified in b)(2)a.ii., the permittee shall conduct certification tests of the H₂S CEMS located at the inlet of the enclosed flare pursuant to 40 CFR Part 60, Appendix B, Performance Specification 7 and ORC section 3704.03(I).

Personnel from the Ohio EPA, Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the H₂S CEMS shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 7 and ORC section 3704.03(I).

Ongoing compliance with the H₂S CEMS requirements contained in this permit, shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

The permittee is required to demonstrate ongoing compliance with the SO₂ emission limitations contained in this permit, demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit [See d)(12)].

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. Emission testing shall be conducted within 90 days of commencing operation of the H₂S control system specified in b)(2)a.ii. in accordance with the following:
 - i. Emission testing shall be conducted to demonstrate compliance with the minimum of 98% reduction in H₂S concentration (by volume) in the untreated LFG. If the collected untreated LFG has an H₂S concentration equal to, or less than 10,000 ppmv, the permittee shall also demonstrate

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compliance with the maximum outlet concentration of H₂S (by volume) of 200 ppmv.

- ii. The reduction efficiency (i.e., the percent reduction in concentration by volume) between the inlet and outlet of the H₂S control system) shall be determined using Method 15 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- b. Emission testing shall be conducted within 180 days of commencing operation of the H₂S control system specified in b)(2)a.ii. in accordance with the following:
- i. Emission testing shall be conducted on exhaust gases from the stack of the enclosed flare specified in b)(2)a.iii. to demonstrate compliance with the following:
 - (a) SO₂ allowable mass emission rate of 35.5 lbs/hr; and
 - (b) No visible emissions from the enclosed flare stack except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
 - ii. Emission testing shall be conducted to demonstrate compliance with the minimum destruction efficiency of 98% for VOC for the open flare specified in b)(2)a.iii.
 - iii. The following test(s) method(s) shall be employed to demonstrate compliance with the allowable mass emission rate and visible emissions limitation:
 - (a) The mass emission rate of SO₂ shall be determined using Methods 1 through 4, and Method 6 or 6C, as appropriate, of 40 CFR Part 60, Appendix A.
 - (b) Method 22 of 40 CFR Part 60, Appendix A shall be used for determining compliance with the no visible emissions limitation.
 - (c) The destruction efficiency of 98% for VOC for the enclosed flare (i.e., the percent reduction in mass emissions between the inlet and outlet of the enclosed flare) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA

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- c. In conjunction with the SO₂ emissions testing required in f)(3)b. above, the permittee shall determine the H₂S to SO₂ conversion rate of the enclosed flare using emissions test results and H₂S concentration data at the inlet to the enclosed flare using Method 15 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. During the emission testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.
- e. 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).
- f. 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.
- g. A comprehensive written report on the results of the emission 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). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (4) 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:

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- a. Emission Limitation: Enclosed flare shall be designed and operated to achieve a minimum destruction efficiency of 98% for VOC.

Applicable Compliance Method: The permittee shall demonstrate compliance with the minimum VOC destruction efficiency by conducting emission testing in accordance with the requirements of section f)(3)b.ii.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- b. Emission Limitation: Enclosed flare shall be designed and operated with no visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method: The permittee shall demonstrate compliance with the no visible emissions restriction by conducting emission testing in accordance with the requirements of section f)(3)b.i.(b).

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- c. Emission Limitation: Enclosed flare shall be designed and operated to operate to achieve a minimum of 98% conversion of all H₂S (contained in the treated LFG) to SO₂.

Applicable Compliance Method: The permittee shall demonstrate compliance with the minimum conversion rate by conducting emission testing in accordance with the requirements of section f)(3)c.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- d. Emission Limitation: SO₂ emissions from the enclosed flare shall not exceed 35.5 lb/hr, as a 24-hour daily average, during normal operations.

Applicable Compliance Method: Compliance with the hourly SO₂ emission limitation shall be based on the on the emissions testing requirements in section f)(3)b.i.(a) and the monitoring and record keeping requirements specified in section d)(1) through d)(3) and d)(12).

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- e. Emission Limitation: SO₂ emissions from the enclosed flare shall not exceed 20.5 lbs/hr, as a 24-hour daily average, when only one of the two H₂S control system trains is operational

Applicable Compliance Method: Compliance with the hourly SO₂ emission limitation shall be based on the monitoring and record keeping requirements specified in section d)(1) through d)(3) and d)(12).

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

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- f. Emission Limitation: SO₂ emissions from the 125-foot open flare shall not exceed 497.2 lbs/hr, as a 24-hour daily average, during periods of startup, shutdown and maintenance when only one of the two H₂S control system trains is operational

Applicable Compliance Method: Compliance with the hourly SO₂ emission limitation shall be based on the monitoring and record keeping requirements specified in sections d)(1) through d)(3) and d)(12).

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- g. Emission Limitation: SO₂ emissions from the 125-foot open flare shall not exceed 870 lbs/hr, has a 24-hour daily average, during periods of startup, shutdown and maintenance of the H₂S control system and enclosed flare

Applicable Compliance Method: Compliance with the hourly SO₂ emission limitation shall be based on the monitoring and record keeping requirements specified in sections d)(1) through d)(3) and d)(12).

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- h. Emission Limitation: The combined H₂S emissions from the enclosed flare (stack), the 125-foot flare (stack) and from the landfill surface (fugitive) shall not exceed 146.95 tons per rolling 12-month period.

Applicable Compliance Method: The emission limitation is based the following calculated H₂S potential to emit emission rates:

- i. 0.04 lb/hr from the enclosed flare (stack) during normal operations
- ii. 0.02 lb/hr from the enclosed flare (stack) when only one of the two H₂S control system trains is operational
- iii. 0.79 lb/hr from the 125-foot open flare (stack) during periods of startup, shutdown and maintenance of the H₂S control system and enclosed flare
- iv. 1.384 lbs/hr from the 125-foot open flare (stack) during periods of H₂S control system startup, shutdown and maintenance periods.
- v. 32.6 lbs/hr from the landfill surface (fugitive) during normal operations and during periods of startup, shutdown and maintenance when only one of the two H₂S control system trains is operational.
- vi. 192.8 lbs/hr from the landfill surface (fugitive) during periods of startup, shutdown and maintenance of the H₂S control system and enclosed flare.

The potential to emit emission rates for H₂S were calculated by applying reductions for LFG capture and control requirements to an uncontrolled H₂S emission rate of 652 lb/hr. The uncontrolled H₂S emission rate was determined based on the following:

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- i. H₂S generation rate using the Environmental Research and Education Foundation (EREF) H₂S generation model below:

$$Q_{H_2S} = \sum_{i=1}^n k S_o M_i (e^{-kt^i})$$

Where:

Q_{H_2S} = H₂S generation rate from the landfill, cubic feet per year
 k = H₂S generation rate constant, yr⁻¹
 S_o = H₂S generation potential, cubic feet of H₂S per ton of waste
 M_i = Mass of sulfur deposited in the nth year, tons
 t_i = age of waste, years

Historical landfill data was applied for sulfur deposited and for determining generation rate constant, and the generation potential.

and

- ii. Historical H₂S concentration and LFG data were applied to generate an H₂S potential to emit of 652 lb/hr projected in 2027.

The permittee shall demonstrate compliance with this emission limitation based on the waste acceptance rate, as determined from the monitoring and recordkeeping requirements specified in d)(15) and compliance with the LFG capture and control requirements.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- i. Emission Limitation: SO₂ emissions shall not exceed 337.6 tons per rolling 12-month period. The annual emission limitation applies to all SO₂ emissions emitted from the enclosed flare and open flare including periods of startup, shutdown, and maintenance of the H₂S control system.

Applicable Compliance Method: Compliance annual limitation shall be based on the monitoring and record keeping requirements specified in sections d)(1) through d)(3) and d)(12).

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- j. Emission Limitation: Fugitive/Uncontrolled Landfill Gas: 4.60 tons fugitive VOC per rolling, 12-month period

Applicable Compliance Method: The emission limitation is based on the highest gas generation/emissions rate which could occur at this facility and can be documented as follows:

- i. NMOC emissions were calculated by Landfill Gas Emission Model (LandGEM). The predicted NMOC emissions were converted to VOC emissions by applying the AP-42 Chapter 2.4 (11/98) conversion rate of 39%, plus a 15% safety factor to account for variation in the gas stream.

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- ii. LFG collection system capture efficiencies, based on engineering design:
 - (a) 95% for North landfill unit (closed cell); and
 - (b) 90% for South landfill unit (active cell)
- iii. A maximum operating schedule of 8,760 hours/year
- iv. Waste Acceptance Rates
 - (a) North landfill unit (closed cell) – actual waste acceptance data
 - (b) South landfill unit (active cell) – actual waste acceptance data and projected waste acceptance rate based on maximum daily waste receipt rate for the landfill not exceed to exceed 7,500 tons of total waste, including MSW and C&DD material.

The permittee shall demonstrate compliance with this emission limitation based on the waste acceptance rate, as determined from the monitoring and recordkeeping requirements specified in d)(15) and the monthly emissions monitoring and recordkeeping requirements specified in d)(14).

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- k. Emission Limitation: Enclosed Flare Combustion Emissions: 17.0 pounds $PM_{10}/10^6$ dscf methane

Applicable Compliance Method: The above flare combustion emission limitations were established based on the emission factors from AP-42 Chapter 2.4, Municipal Solid Waste Landfills (11/98).

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- l. Emission Limitation: Enclosed Flare Combustion Emissions: 0.20 pound CO per mmBtu of methane gas combusted

Applicable Compliance Method: The above flare combustion emission limitations were established based upon a manufacturer guaranteed emission factor. If required, compliance with the lb/mmBtu emission limitation shall be determined in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- m. Emission Limitation: Enclosed Flare Combustion Emissions: 0.06 lb pound NO_x per mmBtu of methane gas combusted

Applicable Compliance Method: The above flare combustion emission limitations were established based upon a manufacturer guaranteed emission factor. If required, compliance with the lb/mmBtu emission limitation shall be determined in accordance with Methods 1-4 and 7 or 7E, as appropriate, of 40 CFR, Part 60, Appendix A.



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[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- n. Emission Limitation: Open flare shall be designed and operated to achieve a minimum destruction efficiency of 98% for VOC.

Applicable Compliance Method: Compliance shall be demonstrated using the information from U.S. EPA's Flare Efficiency Study – EPA-600/2-83-052 (July 1983)

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- o. Emission Limitation: Open Flare Combustion Emissions: 17.0 pounds PM₁₀ /10⁶ dscf methane

Applicable Compliance Method: The above flare combustion emission limitations were established based on the emission factors from AP-42 Chapter 2.4, Municipal Solid Waste Landfills (11/98).

The following is being presented for informational purposes:

The federally enforceable, potential, annual PM₁₀ emissions from the flare can be estimated using the following calculation:

lbs pollutant ⁽¹⁾	1867 dscf ⁽²⁾	0.40 ⁽³⁾	60 mins	8760 hours	1 ton
10 ⁶ scf methane	minute		hour	year	2000 lbs

Where:

- (1) AP-42 Chapter 2.4, Municipal Solid Waste Landfills (11/98).
- (2) Maximum landfill gas flow rate.
- (3) 40% landfill gas methane component.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- p. Emission Limitation: Open Flare Combustion Emissions: 0.068 pound NOx/mmBtu and 0.37 pound CO/mmBtu

Applicable Compliance Method: The above flare combustion emission limitations were established based on the emission factors from AP-42 Chapter 13.5, Industrial Flares (9/91).

The following is being presented for informational purposes:

The federally enforceable, potential annual NOx and CO emissions from the flare can be estimated using the following calculation:

lbs pollutant ⁽¹⁾	68.54 mmBtu ⁽²⁾	8760 hours	1 ton
mmBtu	hour	year	2000 lbs

Where:

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- (1) AP-42 Chapter 13.5, Industrial Flares (9/91).
- (2) Maximum heat input to flare.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- q. Emission Limitation: Visible fugitive PE from the landfill and construction operations shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method: If required, compliance with the visible PE limit shall be determined by visible emission evaluations performed in accordance with USEPA Reference Method 9 as set forth in "Appendix A on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(3)(a) and B)(3)(b) of OAC rule 3745-17-03.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- r. Emission Limitation: There shall be no visible emissions to the outside air from asbestos-containing waste materials during the on-site transportation, transfer, deposition, or compacting operations.

Applicable Compliance Method: If required, compliance with the visible PE limit shall be determined in accordance with USEPA Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources").

[OAC rule 3745-77-07(C)(1) and PTI P0128797]

- (5) The permittee shall comply with the applicable compliance provisions and testing standards required under 40 CFR, Part 62, Subpart OOO, including the following sections:

62.16718(a)(1)	NMOC emission rate calculation: If the actual year-to-year waste acceptance rate is known, use Equation 1. If the actual year-to-year waste acceptance rate is unknown, use Equation 2.
62.16718(a)(2)	Tier 1 NMOC calculation: The owner or operator must compare the calculated NMOC mass emission rate to the standard of 34 megagrams per year.
62.16718(a)(3)	Tier 2 NMOC calculation including sample probe requirements based on number of hectares in the landfill.
62.16718(a)(4)	Tier 3 NMOC calculation including site-specific methane generation rate constant procedures provided in EPA Method 2E of Appendix A-1 of 40 CFR Part 60. The landfill owner or operator must compare the resulting NMOC mass emission rate to the standard of 34 megagrams per year.
62.16718(a)(5)	Alternative calculation methods to determine NMOC concentration or a site-specific methane generation rate constant with approval of the Administrator.
62.16718(a)(6)	Tier 4 NMOC calculation: Demonstrate that surface methane emissions are below 500 parts per million. Surface emission monitoring must be conducted on a quarterly basis using the following procedures. Tier 4 is allowed only if the landfill owner or

	operator can demonstrate that NMOC emissions are greater than or equal to 34 megagrams per year but less than 50 megagrams per year using Tier 1 or Tier 2. If both Tier 1 and Tier 2 indicate NMOC emissions are megagrams per year or greater, then Tier 4 cannot be used.
62.16718(b)(1) through (b)(3)	NMOC calculation to determine when the collection and control system can be removed.
62.16718(c)	Calculating emissions for PSD purposes.
62.16718(d)	Test method for the net heating value of the combusted landfill gas in an open flare.
62.16718(e)	Test methods for enclosed combustion devices.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 62, Subpart OOO]

- (6) The permittee shall comply with the applicable compliance provisions and testing standards required under 40 CFR, Part 63, Subpart AAAA, including the following sections:

62.16718(a)(1)	NMOC emission rate calculation: If the actual year-to-year waste acceptance rate is known, use Equation 1. If the actual year-to-year waste acceptance rate is unknown, use Equation 2.
63.1959(a)(2)	Tier 1 NMOC calculation: The owner or operator must compare the calculated NMOC mass emission rate to the standard of 34 megagrams per year.
63.1959(a)(3)	Tier 2 NMOC calculation including sample probe requirements based on number of hectares in the landfill.
63.1959(a)(4)	Tier 3 NMOC calculation including site-specific methane generation rate constant procedures provided in EPA Method 2E of Appendix A-1 of 40 CFR Part 60. The landfill owner or operator must compare the resulting NMOC mass emission rate to the standard of 34 megagrams per year.
63.1959(a)(5)	Alternative calculation methods to determine NMOC concentration or a site-specific methane generation rate constant with approval of the Administrator.
63.1959(c)	NMOC calculation to determine when the collection and control system can be capped, decommissioned or removed.
63.1959(d)	Performance testing requirements: Method 25, 25A or 25C to determine compliance with 98-weight percent efficiency or the 20 ppmv outlet concentration level, Method 3, 3A or 3C to determine oxygen used for correcting NMOC concentration as hexane to 3 percent. Equation 4 must be used to calculate efficiency.
63.1959(e)	Test method for the net heating value of the combusted landfill gas
63.1959(f)	Performance testing requirements: Conduct testing under representative conditions.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart AAAA]

g) Miscellaneous Requirements

(1) Inactive Waste Disposal Site Requirements

The permittee shall comply with the following provisions of OAC rule 3745-20-07 for inactive waste disposal sites:

- a. Each owner or operator of an inactive asbestos waste disposal site shall either:
 - i. Discharge no visible emissions to the outside air from an inactive waste disposal site; or
 - ii. Cover the asbestos-containing waste material with at least six (6) inches of non-asbestos- containing material, and grow and maintain a cover of vegetation on the area adequate to prevent exposure of the asbestos-containing waste material; or
 - iii. Cover the asbestos-containing material with at least two (2) feet of compacted non-asbestos-containing material and maintain the cover to prevent exposure of the asbestos-containing waste material.
- b. Unless a natural barrier adequately deters access by the general public, each owner or operator of an inactive asbestos waste disposal site shall install and maintain warning signs and fencing as follows or comply with g)(1)a.ii. or g)(1)a.iii.:
 - i. Display warning signs at all entrances and at intervals of three hundred feet or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material was deposited. The warning signs must:
 - (a) Be posted in such a manner and location that a person can easily read the legend; and
 - (b) Conform to the requirements for a twenty inch by fourteen inch (20 x 14) upright format warning sign and display the following legend in the lower panel with letter sizes of at least one (1) inch sans serif, gothic, or block. Spacing between any two lines must be at least equal to the height of the upper of the two lines:

“ASBESTOS WASTE DISPOSAL SITE
DO NOT CREATE DUST
BREATHING ASBESTOS IS HAZARDOUS
TO YOUR HEALTH”
 - (c) Fence the perimeter of the site in a manner adequate to deter access by the general public.

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- (d) Upon request and submission of appropriate information, the director will determine whether a fence or a natural barrier adequately deters access by the public.
 - (e) When requesting a determination on whether a natural barrier adequately deters public access, supply information enabling the director to determine whether a fence or a natural barrier adequately deters access by the general public.
- c. The owner or operator may use an alternative control method that has received prior approval of the director rather than comply with the requirements of g)(2)a. or g)(1)b.
- d. Each owner or operator of an inactive waste disposal site shall notify the director, in writing, at least forty-five (45) days prior to excavating or otherwise disturbing or removing any asbestos-containing waste material. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided to the director at least ten (10) working days before excavation begins. In no event shall excavation begin earlier than the date specified in the original notification. Each owner or operator shall include the following information in the notice:
 - i. Scheduled starting and completion dates.
 - ii. Reason for disturbing the waste.
 - iii. Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing material. If deemed necessary, the director may require changes in the emission control procedures to be used.
 - iv. Location of any temporary storage site including names and address(es) and the final disposal site.
- e. Within sixty (60) days of a site becoming inactive, record a notation of the presence of asbestos-containing material on the deed to the facility property and on any other instrument that would normally be examined during the title search; this notation will, in perpetuity, notify any potential purchaser of the property that:
 - i. The land has been used for the disposal of asbestos-containing waste material; and
 - ii. The survey plot and record of the location and quantity of asbestos-containing waste disposed of within the disposal site required in paragraph (C)(2) of rule 3745-20-06 of the Ohio Administrative Code has been filed with the director; and
 - iii. The site is subject to Chapter 3745-20 of the Ohio Administrative Code and 40 CFR Part 61, Subpart M.



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[OAC rule 3745-77-07(C)(1), OAC rule 3745-20-07 and PTI P0128797]

- (2) The permittee shall comply with the requirements for inactive waste disposal sites for asbestos mills and manufacturing and fabricating operations required under 40 CFR Part 61, Subpart M, including the following sections:

Emission Limitations and Additional Restrictions:	
61.151(a)(1); or	Visible emission restriction.
61.151(a)(2); or	Coverage and/or vegetation requirements.
61.151(a)(3); or	Coverage requirement.
61.154(a)(4); and	Dust suppressant requirement.
61.154(b); or	Natural barrier, sign, and/or fencing requirements.
61.154(c)	Alternative control method requirements.
Monitoring and/or Recordkeeping Requirements:	
61.151(e)	Deed recordkeeping requirements.
Reporting Requirements:	
61.151(d)	Reporting requirements for excavating or disturbing deposited asbestos waste.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart M and PTI P0128797]

- (3) There shall be no open burning in violation of Ohio Administrative Code rule 3745-19 at this facility.

[OAC rule 3745-77-07(C)(1) and PTI P0128797]