



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

12/22/2008

Certified Mail

Timothy Nytra
Carbon Limestone Sanitary Landfill
8100 South State Line Road
Lowellville, OH 44436

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0250070850
Permit Number: 02-22526
Permit Type: OAC Chapter 3745-31 Modification
County: Mahoning

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
Yes	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc>.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA DAPC, Northeast District Office

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install
for
Carbon Limestone Sanitary Landfill**

Facility ID: 0250070850
Permit Number: 02-22526
Permit Type: OAC Chapter 3745-31 Modification
Issued: 12/22/2008
Effective: 12/22/2008



Air Pollution Permit-to-Install
for
Carbon Limestone Sanitary Landfill

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

 1. Federally Enforceable Standard Terms and Conditions 4

 2. Severability Clause 4

 3. General Requirements 4

 4. Monitoring and Related Record Keeping and Reporting Requirements 5

 5. Scheduled Maintenance/Malfunction Reporting 6

 6. Compliance Requirements 6

 7. Best Available Technology 7

 8. Air Pollution Nuisance 7

 9. Reporting Requirements 7

 10. Applicability 8

 11. Construction of New Sources(s) and Authorization to Install 8

 12. Permit-To-Operate Application 9

 13. Construction Compliance Certification 9

 14. Public Disclosure 9

 15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission
 Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9

 16. Fees 10

 17. Permit Transfers 10

 18. Risk Management Plans 10

 19. Title IV Provisions 10

B. Facility-Wide Terms and Conditions 11

C. Emissions Unit Terms and Conditions 13

 1. F001, Facility roadways and parking areas 14

 2. F002, Landfill Operations 19



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 02-22526
Facility ID: 0250070850
Effective Date: 12/22/2008

Authorization

Facility ID: 0250070850
Facility Description: Sanitary Landfill
Application Number(s): A0002887
Permit Number: 02-22526
Permit Description: Request to increase the allowable maximum daily waste receipt amount.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00
Issue Date: 12/22/2008
Effective Date: 12/22/2008

This document constitutes issuance to:

Carbon Limestone Sanitary Landfill
8100 South State Line Road
Lowellville, OH 44436

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 02-22526
Facility ID: 0250070850
Effective Date: 12/22/2008

Authorization (continued)

Permit Number: 02-22526
 Permit Description: Request to increase the allowable maximum daily waste receipt amount.

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

Emissions Unit ID:	F001
Company Equipment ID:	Roadway Traffic
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	MSW Landfill
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 02-22526
Facility ID: 0250070850
Effective Date: 12/22/2008

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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



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

4. Monitoring and Related Record Keeping and Reporting Requirements

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



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

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

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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



Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted



for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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



16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 02-22526
Facility ID: 0250070850
Effective Date: 12/22/2008

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 02-22526
Facility ID: 0250070850
Effective Date: 12/22/2008

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 02-22526
Facility ID: 0250070850
Effective Date: 12/22/2008

C. Emissions Unit Terms and Conditions



1. F001, Facility roadways and parking areas

Operations, Property and/or Equipment Description:

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Paved roadways and parking areas		
a.	OAC rule 3745-31-05(A)(3)	37.0 tons/year of fugitive particulate emissions (PE) There shall be no visible PE except for 1 minute during any 60-minute period. The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust [See b)(2)a through b)(2)f.]
Unpaved roadways and parking areas		
b.	OAC rule 3745-31-05(A)(3)	125.2 tons/year of fugitive PE There shall be no visible PE except for 3 minutes during any 60-minute period. The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust [See b)(2)a through b)(2)f.]
Unpaved and paved roadways and parking areas		
c.	OAC rule 3745-17-07(B)(5)	In accordance with paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) shall not apply to this emissions unit.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	In accordance with paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) shall not apply to this emissions unit.

(2) Additional Terms and Conditions

- a. The permittee shall employ best available control measures on all paved and unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements.

In accordance with the permittee's application, the permittee has committed to treat the paved and unpaved roadways and parking areas with water via a spray truck and/or by sweeping at sufficient treatment frequencies and to maintain and enforce speed limits sufficient to ensure compliance with the visible emissions limitations of this permit.

Nothing in this paragraph shall prohibit the permittee from employing other 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 paved or unpaved roadways and parking areas that 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- c. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- d. 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.
- e. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface resulting from the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.



- 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 (BAT) requirements of OAC rule 3745-31-05.
- c) Operational Restrictions
 - (1) The permittee shall post speed limit signs identifying the maximum on-site speed limit on facility roadways.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) Except as otherwise provided in this section, the permittee shall perform inspections of the paved and unpaved roadways and parking areas once per day of operation.
 - (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
 - (3) The permittee may, upon receipt of written approval from the Northeast District Office of Ohio EPA, modify the above-mentioned inspection frequencies, if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
 - (4) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
 - (5) The information required in d)(4)d shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
- e) Reporting Requirements
 - (1) The permittee shall submit deviation reports that identify any of the following occurrences:



- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- (2) The deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:

There shall be no visible particulate emissions of fugitive dust from any unpaved roadway or parking area surface except for a time not to exceed 3 minutes during any 60-minute observation period.

Applicable Compliance Method:

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

There shall be no visible particulate emissions of fugitive dust from any paved roadway or parking area surface except for a time not to exceed 1 minute during any 60-minute observation period.

Applicable Compliance Method:

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

125.2 tons/year of fugitive PE from unpaved roadways and parking areas

Applicable Compliance Method:

Compliance with fugitive PE limitation shall be determined by using the emission factor equation in Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for unpaved roadways.



These emission limits are based on the calculations submitted by the permittee for road segments A, C, and E, including a 90 percent (%) control efficiency for PE.

d. Emission Limitation:

37.0 tons/year of fugitive PE from paved roadways and parking areas

Applicable Compliance Method:

Compliance with fugitive PE limitations shall be determined by using the emission factor equations in Section 13.2.1, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for paved roadways. These emission limits are based on the calculations submitted by the permittee for road segments B and D, including a 90 percent (%) control efficiency for PE.

g) Miscellaneous Requirements

- (1) None.



2. F002, Landfill Operations

Operations, Property and/or Equipment Description:

(F002) – Landfill Operations includes a 6,000 cfm previously installed enclosed combustor, a 6,000 cfm enclosed combustor to be installed after issuance, and landfill operations including material handling and wind erosion at the working face

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) d)(18) through d)(21) and e)(7)
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	132.7 tons of fugitive non-methane organic compounds (NMOC)/year 20,750 tons of fugitive methane (CH ₄)/year 30.5 tons of fugitive HAP emissions/year 12.4 tons of fugitive particulate emissions (PE)/year 51.8 tons of fugitive volatile organic compounds (VOC)/year Visible fugitive PE shall not exceed 20% opacity, as a 3-minute average. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See c)(9) through c)(12)]. See b)(2)a. 6,000 ft³/min Enclosed Combustor (previously installed): 0.15 lb of carbon monoxide (CO)/mmBtu; 25.5



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>lbs of CO/hour; 111.7 tons of CO/year</p> <p>0.06 lb of nitrogen oxides (NO_x)/mmBtu; 10.2 lbs of NO_x/hour; 44.7 tons of NO_x/year</p> <p>2.8 lbs of sulfur dioxide (SO₂)/hour; 12.3 tons of SO₂/year</p> <p>1.5 lbs of hydrogen chloride (HCl)/hour; 6.6 tons of HCl/year</p> <p>3.2 lbs of particulate matter less than 10 microns (PM₁₀) /hour; 14.0 tons of PM₁₀/year</p> <p>(All particulate emissions from the enclosed combustor are PM₁₀.)</p> <p>Visible emissions from the stack shall not exceed 10% opacity, as a 6-minute average.</p> <p>6,000 ft³/min Enclosed Combustor (to be installed after issuance):</p> <p>0.15 lb of carbon monoxide (CO)/mmBtu; 25.5 lbs of CO/hour; 111.7 tons of CO/year</p> <p>0.06 lb of nitrogen oxides (NO_x)/mmBtu; 10.2 lbs of NO_x/hour; 44.7 tons of NO_x/year</p> <p>2.8 lbs of sulfur dioxide (SO₂)/hour; 12.3 tons of SO₂/year</p> <p>1.5 lbs of hydrogen chloride (HCl)/hour; 6.6 tons of HCl/year</p> <p>3.2 lbs of particulate matter less than 10 microns (PM₁₀) /hour; 14.0 tons of PM₁₀/year</p> <p>(All particulate emissions from the enclosed combustor are PM₁₀.)</p> <p>Visible emissions from the stack, shall not exceed 10% opacity, as a 6-minute average.</p>
b.	40 CFR 60.750 (NSPS, Subpart WWW)	See b)(2)b. through b)(2)j.
c.	40 CFR 63.6(e)(3) (MACT, Subpart AAAA)	See b)(2)k.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-08(B)	Exempt, pursuant to OAC rule 3745-17-08(A)(1).
e.	OAC rule 3745-17-07(B)(1)	Exempt, pursuant to OAC rule 3745-17-07(B)(11)(e).

(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the terms and conditions of this permit. The requirements of this rule also include compliance with the requirements of 40 CFR, Part 60, Subpart WWW and 40 CFR, Part 63, Subpart AAAA.
- b. The permittee shall operate the active collection and control system to capture the gas generated within the landfill and route all the collected gas to either (1) an enclosed combustion device, which shall either reduce the NMOC by 98 percent by weight or reduce the outlet NMOC concentration to less than 20 ppm by volume, on a dry basis as hexane at 3% oxygen or (2) a gas treatment system, which shall process the collected gas for subsequent sale or use, with a collection and control system that either reduces the NMOC by 98 percent by weight or reduces the outlet NMOC concentration to less than 20 ppm by volume, on a dry basis as hexane at 3% oxygen, which would include a flare meeting the requirements of 40 CFR 60.18 or (3) an open flare, which is designed and operated in accordance with 40 CFR 60.18.
- c. The landfill gas collection system shall satisfy the following requirements, as specified in 40 CFR 60.752(b)(2)(ii)(A):
 - i. the system shall be designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control or treatment system equipment;
 - ii. the system shall collect gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of 5 years or more if active, or 2 years or more if closed or at final grade;
 - iii. the system shall collect gas at a sufficient extraction rate; and
 - iv. the system shall be designed to minimize off-site migration of subsurface gas.
- d. The permittee shall install and place each well or design component as specified in the approved design plan. Each well shall be installed no later than 60 days after the date on which the initial solid waste has been in place for a period of five years or more, if active; or two years or more, if closed or at final grade.
- e. The collection and control system may be capped or removed provided that all of the following conditions, as specified in 40 CFR 60.752(b)(2)(v), are met:



- i. The landfill shall no longer be accepting solid waste and shall be permanently closed as defined in 40 CFR 60.751 and in accordance with the requirements of 40 CFR 258.60.
 - ii. The collection and control system shall have been in operation a minimum of 15 years.
 - iii. The NMOC emission rate of the landfill, calculated per 40 CFR 60.754(b), shall be less than 50 megagrams/year on three successive test dates. The test dates shall be no less than 90 days and no more than 180 days apart.
 - iv. A closure report shall be submitted to the Northeast District Office of the Ohio EPA within 30 days of waste acceptance cessation and no additional wastes shall be placed in the landfill.
- f. The permittee shall 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 Director:
- i. The collection devices within the interior and along the perimeter areas shall be certified to achieve comprehensive control of surface gas emissions by a professional engineer. The following issues shall be addressed in the design: depths of refuse, refuse gas generation rates and flow characteristics, cover properties, gas system expandability, leachate and condensate management, accessibility, compatibility with filling operations, integration with closure end use, air intrusion control, corrosion resistance, fill settlement, and resistance to the refuse decomposition heat.
 - ii. The sufficient density of gas collection devices, determined above, shall address landfill gas migration issues and augmentation of the collection system through the use of active systems at the landfill perimeter or exterior.
- g. The permittee shall convey the landfill gas to a control system through the collection header pipe(s). The gas moving equipment shall be sized to handle the maximum gas generation flow rate expected over its intended period of use, using the following procedures:
- i. For existing collecting systems, the actual flow data shall be used to project the maximum flow rate.
 - ii. For new collection systems, the maximum flow rate shall be calculated in accordance with 40 CFR 60.755(a)(1), using the formula also contained in the Testing Section of this permit.
- h. Landfill gas collection devices shall be placed to control all gas producing areas except those that meet the following requirements:

- i. Any segregated area of non-degradable material may be excluded from the gas collection requirements if up-to-date plot maps showing each uniquely identified existing and planned collector in the system, their locations on the map, and the type of waste deposited in each area has been documented. The documentation shall provide the nature, date of deposition, location, and amount of non-degradable material deposited in the area, and shall be provided to the Director upon request.
- ii. Any non-productive area of the landfill may be excluded from control, provided that the total of all excluded areas can be shown to contribute less than 1% of the total amount of NMOC emissions from the landfill. The amount, location, and age of the material shall be documented and provided to the Director upon request. A separate NMOC emissions estimate shall be made for each section proposed for exclusion, and the sum of all such sections shall be compared to the NMOC emissions estimate for the entire landfill.

Emissions from each section shall be computed using the following equation:

$$Q_i = 2k L_0 M_i (e^{-kt_i}) C_{NMOC} (3.6 \times 10^{-9})$$

where:

- Q_i = NMOC emission rate from the ith section, in megagrams per year;
- k = methane generation rate constant, in year⁻¹;
- L₀ = methane generation potential, in cubic meters per megagram solid waste;
- M_i = mass of the degradable solid waste in the ith section, in megagram;
- t_i = age of the solid waste in the ith section, in years;
- C_{NMOC} = concentration of nonmethane organic compounds, in parts per million by volume; and
- 3.6 x 10⁻⁹ = conversion factor.

- iii. The values for k, L₀, and C_{NMOC} determined in field testing shall be used, if field testing has been performed in determining the NMOC emission rate or the radii of influence. If field testing has not been performed, the default values for k, L₀ and C_{NMOC} are as follows:

- k** = 0.05 per year;
- L₀ = 170 cubic meters per megagram; and
- C_{NMOC} = 4,000 parts per million by volume as hexane.

** For landfills located in geographical areas with a thirty-year annual average precipitation of less than 25 inches, as measured at the nearest representative official meteorologic site, the k value to be used is 0.02 per year.



- i. When the permittee constructs new gas collection devices, the permittee shall use the following equipment or procedures:
 - i. The landfill gas extraction components shall be constructed of polyvinyl chloride (PVC), high density polyethylene (HDPE) pipe, fiberglass, stainless steel, or other nonporous corrosion resistant material of suitable dimensions to: convey projected amounts of gases; withstand installation, static, and settlement forces; and withstand planned overburden or traffic loads. The collection system shall extend as necessary to comply with emission and migration standards. Collection devices such as wells and horizontal collectors shall be perforated to allow gas entry without head loss sufficient to impair performance across the intended extent of control. Perforations shall be situated with regard to the need to prevent excessive air infiltration.
 - ii. Vertical wells shall be placed so as not to endanger underlying liners and shall address the occurrence of water within the landfill. Holes and trenches constructed for piped wells and horizontal collectors shall be of sufficient cross-section so as to allow for their proper construction and completion including, for example, centering of pipes and placement of gravel backfill. Collection devices shall be designed so as not to allow indirect short circuiting of air into the cover or refuse into the collection system or gas into the air. Any gravel used around pipe perforations should be of a dimension so as not to penetrate or block perforations.
 - iii. Collection devices may be connected to the collection header pipes below or above the landfill surface. The connector assembly shall include a positive closing throttle valve, any necessary seals and couplings, access couplings and at least one sampling port. The collection devices shall be constructed of PVC, HDPE, fiberglass, stainless steel, or other nonporous material of suitable thickness.
- j. The provisions of this permit, under the authority of 40 CFR, Part 60, Subpart WWW, apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of the start-up, shutdown, or malfunction event does not exceed 5 days for collection systems and does not exceed 1 hour for treatment or control devices, in which case any deviation from the requirements shall be recorded and included in the semiannual report.
- k. The permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan according to the provisions in 40 CFR 63.6(e)(3). A copy of the SSM plan must be maintained on site.
- l. There shall be no open burning, in violation of OAC Chapter 3745-19, at this facility.
- m. Pursuant to the authority in ORC section 3704.03(L), any representative of the Director may, upon presentation of proper identification, enter at any reasonable time upon any portion of the property where this landfill is located, including any improvements thereon, to make inspections; take samples; conduct tests; examine records or reports pertaining to any emissions of air contaminants; and



inspect monitoring equipment, emissions control equipment, and/or methods of operation and gas sampling. No operator or agent of this landfill shall act in any manner to refuse, hinder, or thwart this legal right of entry.

c) Operational Restrictions

- (1) The permittee shall 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 for 2 years or more if closed or at final grade, and as required in 40 CFR 60.752, 60.753, and this permit. The collection and control system shall meet the specifications for an active collection system as required in 40 CFR 60.759, included in this permit.
- (2) The permittee shall operate the collection system with negative pressure at each wellhead except under the following conditions:
 - a. a fire or increased well temperature (the permittee shall record all instances when positive pressure occurs in efforts to avoid a fire);
 - b. use of a geomembrane or synthetic cover (the permittee shall develop acceptable pressure limits in the design plan); or
 - c. decommissioned well (a well may experience a static positive pressure after shutdown to accommodate for declining flows). All design changes shall be approved by the Ohio EPA.
- (3) The permittee shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius and with either a nitrogen level less than 20% or an oxygen level less than 5%. The permittee may establish a higher operating temperature, nitrogen level, or oxygen level at a particular well, if it can be demonstrated with supporting data, that the elevated parameter could not cause fires or significantly inhibit anaerobic decomposition by killing methanogens. The nitrogen or oxygen concentration shall be determined as required in the Testing Section of this permit.
- (4) The permittee shall operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the permittee shall conduct surface testing on a quarterly basis around the perimeter of the collection area and along a pattern that traverses the landfill at 30-meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover.

The permittee may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan shall be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30-meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing.

The permittee shall install a new well or other collection device for any location where the monitored methane concentration equals or exceeds 500 ppm above background three times within a quarterly period and within 120 calendar days of the initial



exceedance. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding timeline for installation may be submitted to the Ohio EPA for approval.

- (5) The permittee shall operate the collection system such that all collected gases are vented to a control system designed and operated in compliance with the requirements in this permit. In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within 1 hour.
- (6) The permittee shall operate the control and/or treatment system at all times when the collected gas is routed to the system.
- (7) If monitoring demonstrates that the operational requirements for negative pressure, interior wellhead temperature, wellhead oxygen or nitrogen concentration, and/or surface methane levels are not met, corrective action shall be taken as specified in the monitoring and record keeping requirements for the pressure, temperature, oxygen or nitrogen concentration at each well's gas collection header and surface methane measurements. If corrective actions are taken as specified in 40 CFR 60.755, the monitored exceedance is not a violation of the operational requirements.
- (8) The permittee shall operate the control device within the parameter ranges established during the initial or most recent performance test. The parameters established shall be based on the control device installed and may include a heat sensing device, gas flow rate measuring device, and/or gauge pressure device in the gas collection header.
- (9) The permittee shall ensure that solid wastes are deposited, spread, and compacted in such a manner as to minimize or prevent visible emissions of fugitive dust. The permittee shall require all truckloads of solid waste to be unloaded in a manner that will minimize the drop height of the solid wastes. Any dusty materials or wastes likely to become airborne shall be watered as necessary prior to or during dumping operations in order to minimize or eliminate visible emissions of fugitive dust. Watering shall be conducted in such a manner as to avoid the pooling of liquids and runoff. No dusty material shall be dumped during periods of high wind speed, unless the material has been treated to prevent fugitive dust emissions from becoming airborne.
- (10) 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 permit application, the permittee maintains that the inherent moisture content of the materials involved in fugitive dust operations/sources is at a level which is more than sufficient to comply with all applicable requirements. If at any time the moisture content is not sufficient to meet the above applicable requirements, the permittee shall employ best available control measures to ensure compliance.
- (11) The above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the fugitive dust operation/sources until further observation confirms that use of the control measure(s) is unnecessary.



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

d) Monitoring and/or Recordkeeping Requirement

- (1) The permittee shall keep for at least 5 years, up-to-date, readily accessible, on-site records of the design capacity report which showed the landfill capacity to equal or exceed 2.5 million megagrams and/or 2.5 million cubic meters, the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either hardcopy or electronic formats are acceptable.
- (2) The permittee shall keep up-to-date, readily accessible records for the life of the control equipment of the data listed below, as measured during the initial performance test or compliance determination:
 - a. the maximum expected gas generation flow rate, as calculated in 40 CFR 60.755(a)(1) and as required in this permit; and
 - b. the density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined using the procedures specified in 40 CFR 60.759(a)(1) and this permit.

Records of subsequent tests or monitoring shall be maintained for a minimum of 5 years. Records of the control device vendor specifications shall be maintained until removal.

- (3) The permittee of a controlled landfill subject to the provisions of this subpart shall keep for 5 years, up-to-date, readily accessible continuous records of the control equipment operating parameters specified to be monitored in 40 CFR 60.756, 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.
- (4) The permittee shall 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 for each collector.
- (5) The permittee shall keep up-to-date, readily accessible records of the installation date and location of all newly installed collectors as specified under 40 CFR 60.755(b) and as required in this permit.
- (6) The permittee shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing and/or nondegradable wastes, excluded from collection as provided in 40 CFR 60.759(a)(3)(i), as well as any nonproductive areas excluded from collection as provided in 40 CFR 60.759(a)(3)(ii).
- (7) The permittee shall keep for at least 5 years up-to-date, readily accessible records of all collection and control system exceedances of the operational standards contained in 40 CFR 60.753 and this permit, the reading in the subsequent month, whether or not the second reading is an exceedance, and the location of each exceedance.

- (8) For the active gas collection system, the permittee shall install a sampling port and a thermometer, or other temperature measuring device, or an access port for temperature measurements at each wellhead and record the following information on a monthly basis:
- a. the gauge pressure in the gas collection header at each individual well, in pounds per square inch;
 - b. the nitrogen or oxygen concentration in the landfill gas, in percent; and
 - c. the temperature of the landfill gas, in degrees Celsius.

If a well exceeds one of the operating parameters as specified in this permit, except as provided under 40 CFR 60.753(b) and (c)^{***}, action shall be initiated to correct the exceedances within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative time line for correcting the exceedance may be submitted to the Northeast District Office for approval.

^{***} 40 CFR 60.753(b) allows a positive pressure under three exceptions: in the case of a fire or increased well temperatures; with the use of a geomembrane or synthetic cover; and on a decommissioned well. 40 CFR 60.753(c) allows a higher operating value with a demonstration, including supporting data, that the elevated parameters of temperature and nitrogen or oxygen concentrations could not support a fire or significantly inhibit anaerobic decomposition by killing methanogens.

- (9) The permittee shall monitor surface concentrations of methane on a quarterly basis according to the instrument specifications and procedures provided below. Any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may revert to annual monitoring; however, during the annual monitoring, any methane reading of 500 ppm or more above background detected, returns the frequency for that landfill back to quarterly monitoring. The permittee shall monitor surface concentrations of methane on a quarterly basis as follows:
- a. surface concentrations of methane shall be monitored, in ppm, along the entire perimeter of the collection area and along a pattern spaced 30 meters apart (or a site-specific established spacing) and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover for each collection area;
 - b. the background concentration shall be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells;
 - c. surface emission monitoring shall be performed in accordance with Section 4.3.1 of Method 21 of Appendix A of 40 CFR Part 60, except that the probe inlet shall be placed within 5 to 10 centimeters of the ground. Monitoring shall be performed during typical meteorological conditions; and



- d. any reading of 500 ppm or more above background at any location shall be recorded as a monitored exceedance and the actions specified below shall be taken. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements listed in c):
 - i. The location of each monitored exceedance shall be marked and the location recorded.
 - ii. Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be remonitored within 10 calendar days of detecting the exceedance
 - iii. If the remonitoring of the location shows a second exceedance, additional corrective action shall be taken and the location shall be monitored again within 10 days of the second exceedance. If the remonitoring shows a third exceedance for the same location, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance. No further monitoring of that location is required until the new well(s) or collection device has been installed.
 - iv. Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10-day remonitoring specified above shall be remonitored 1 month from the initial exceedance. If the 1-month remonitoring shows a concentration less than 500 ppm above background, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month remonitoring shows an exceedance, the actions specified above shall be taken.
 - v. For any location where the monitored methane concentration equals or exceeds 500 ppm above background three times within a quarterly period, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance.
 - vi. An alternative remedy to the exceedance, such as upgrading the blower, header pipes or control device, and a corresponding time line for installation may be submitted to the Ohio EPA for approval.
 - e. The monitor used shall meet the requirements of 40 CFR 60.755(c).
- (10) The permittee shall implement a program to monitor for the integrity of the cover on a monthly basis and implement cover repairs as necessary.
- (11) For the purpose of demonstrating whether the gas collection system flow rate meets the requirements for a sufficient extraction rate, the permittee shall measure gauge pressure in the gas collection header at each individual well, monthly. If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the three conditions allowed under 40 CFR 60.753(b). If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of



the initial measurement of positive pressure. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Director for approval. The permittee is not required to expand the system during the first 180 days after gas collection system startup.

- (12) For the purpose of identifying whether excess air infiltration into the landfill is occurring, the permittee shall monitor each well monthly for temperature and nitrogen or oxygen as provided in 40 CFR 60.753(c). If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Director for approval.
- (13) The permittee using an enclosed combustor to demonstrate compliance with the landfill gas control requirements must install, calibrate, maintain and operate, according to the manufacturer's specification, the following equipment:
- a. A temperature monitoring device equipped with a continuous recorder, having a minimum accuracy of +/- 1 percent of the temperature being measured expressed in degrees Celsius or +/- 0.5 degrees Celsius, whichever is greater;
 - b. A device that records flow to or bypass of the combustor. The permittee shall either:
 - i. install, calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or
 - ii. secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

A temperature monitoring device is not required for a boiler or process heater with design heat input capacity equal to or greater than 44 megawatts.

- (14) The permittee shall keep up-to-date, readily accessible records, for the life of the control equipment, and as measured during the initial performance test or compliance determination, of the following records:
- a. the average combustion temperature measured at least every 15 minutes and averaged over the same time period of the performance test; and
 - b. the percent reduction of NMOC achieved by the combustor and determined as specified in 40 CFR 60.752(b)(2)(iii)(B) and this permit.

Records of subsequent tests or monitoring shall be maintained for a minimum of 5 years. Records of the control device vendor specifications shall be maintained until removal.



- (15) The following shall constitute an exceedance for the enclosed combustor and shall be reported under 40 CFR 60.757(f) and as required in this permit: all 3-hour periods of operation during which the average combustion temperature was more than 28 degrees Celsius below the average combustion temperature during the most recent performance test that demonstrated compliance.
- (16) The permittee shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing and/or nondegradable wastes, excluded from collection as provided in 40 CFR 60.759(a)(3)(i), as well as any nonproductive areas excluded from collection as provided in 40 CFR 60.759(a)(3)(ii).
- (17) The permittee shall perform inspections of the landfill operation areas daily.

The permittee shall maintain a daily operations log which records/documents any watering activity employed to minimize or eliminate visible emissions of fugitive dust for each waste dumping/placement area.

The inspections shall be performed during representative, normal operating conditions.

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 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.

The information shall be kept updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

- (18) The PTI application for this emissions unit(s), was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute[®], ORC 3704.03(F), was applied to this/these emissions unit(s) 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 AReview of New Sources of Air Toxic Emissions, Option A[®], as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been



documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices Δ ; or
- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) Δ Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices Δ ; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., $\Delta X \Delta$ hours per day and $\Delta Y \Delta$ 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 Δ worst case Δ toxic contaminant(s):

Toxic Contaminant: Hydrogen Chloride

TLV (mg/m³): 2,983,000

Maximum Hourly Emission Rate (lbs/hr): 1.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 0.192

MAGLC (ug/m³): 71.02

The permittee, has demonstrated that emissions of hydrogen chloride from the landfill operations are 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 Δ Toxic Air Contaminant Statute Δ , ORC 3704.03(F).

- (19) 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 Δ , the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:



- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the A 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 A Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) 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.

- (20) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the A 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 A 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 A 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 A 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.
- (21) 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 A Toxic Air



Contaminant Statute⁶, 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.

- (22) The permittee shall keep the following records:
- a. the annual estimated landfill gas (LFG) generation rate from the landfill, the LFG generation shall be predicted based on using the LANDGEM computer model or other model that is approved by the Director; and
 - b. the annual amount of LFG captured by the LFG collection system.
- e) Reporting Requirements
- (1) The permittee shall submit semiannual reports to the Director, for the landfill collection and control system, which includes the following recorded information:
- a. value and length of time for each exceedance of the applicable parameters monitored under 40 CFR 60.756, at each wellhead and as required for the control equipment, which would include:
 - i. a positive pressure was not corrected within 15 calendar days, when not meeting the three exceptions in 40 CFR 60.753(b) (fire hazard, synthetic cover, or a decommissioned well);
 - ii. the temperature and oxygen or nitrogen exceeded the applicable limits and was not corrected within 15 calendar days;
 - iii. for enclosed combustors, excluding boilers and process heaters with design heat input capacity of 150 million Btu/hour or greater, all 3-hour periods of operation during which the average combustion temperature was more than 28 degrees Celsius below the average combustion temperature during the most recent performance test demonstrating compliance; and
 - iv. any loss of flame to the flare, as detected by the heat sensing device;
 - b. description and duration of all periods when the gas stream is diverted from the control device through a bypass line or any indication of periods of bypass of the control device;
 - c. description and duration of all periods when the control device was not operating for a period exceeding 1 hour and length of time the control device was not operating;
 - d. all periods when the collection system was not operating in excess of 5 days;
 - e. the location of each exceedance of the 500 ppm methane surface concentration, over the background level, and the concentration recorded at each location for which an exceedance was recorded in the previous month; and



- f. the date of installation and the location of each well or collection system expansion added.

This annual report required by 40 CFR 60.757(f) shall be submitted every six months, as required per 40 CFR 63.1980(a), including information on all deviations that occurred during the 6-month reporting period. Deviations for continuous emission monitors or numerical continuous parameter monitors shall be determined using a 3-hour monitoring block average. These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous six calendar months.

- (2) Pursuant to the New Source Performance Standards (NSPS), the source owner/operator is hereby advised of the requirements to report the following at the appropriate times:
 - a. construction date (no later than 30 days after such date);
 - b. actual start-up date (within 15 days after such date); and
 - c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency

DAPC – Permit Management Unit Lazarus Government Center

P.O. Box 1049

Columbus, OH 43216-1049

and

Ohio EPA, Northeast District Office

2110 East Aurora Road

Twinsburg, OH 44087

- (3) The permittee, in seeking to comply with 40 CFR 60.752(b)(2)(iii) or the control requirements of this subpart, shall include the following information with the initial performance test report required under 40 CFR 60.8:
 - a. a diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for the future collection system expansion;
 - b. the data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based;



- c. the documentation of the presence of asbestos or nondegradable material for each area from which collection wells have been excluded based on the presence of asbestos or nondegradable material;
 - d. the sum of the gas generation flow rates for all areas from which collection wells have been excluded based on nonproductivity and the calculations of gas generation flow rate for each excluded area;
 - e. the provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill; and
 - f. the provisions for the control of off-site migration.
- (4) The permittee shall submit a closure report to the Division of Air Pollution Control Northeast District Office, within 30 days of waste acceptance cessation. Permanent closure shall be conducted in accordance with the requirements of 40 CFR 258.60; and the Ohio EPA may request additional information, as may be necessary, to verify that all of these conditions are met. If a closure report has been submitted to the Ohio EPA, no additional wastes may be placed into the landfill without filing a notification of modification as described in 40 CFR 60.7(a)(4).
- (5) The permittee shall submit an equipment removal report to the Division of Air Pollution Control at the Northeast District Office, 30 days prior to removal or cessation of operation of the control equipment. The Ohio EPA may request additional information as may be necessary to verify that all of the conditions for removal in 40 CFR 60.752(b)(2)(v) have been met. The equipment removal report shall contain the following information, as specified in 40 CFR 60.757(e)(1):
- a. a copy of the closure report;
 - b. a copy of the initial performance test report demonstrating that the 15-year minimum control period has expired; and
 - c. dated copies of three successive NMOC emission rate reports demonstrating that the landfill is no longer producing 50 megagrams or greater of NMOC per year.
- (6) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- a. each day during which an inspection was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- (7) The permittee shall submit annual reports to the Ohio EPA Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute[@], ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If



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

f) Testing Requirements

- (1) After the installation of a collection and control system in compliance with 40 CFR 60.755, the permittee shall calculate the NMOC emission rate for purposes of determining when the system can be removed, as provided in 40 CFR 60.752(b)(2)(v), using the following procedures to calculate the mass emission rate of NMOC and by applying the testing results in the following equation:

$$M_{\text{NMOC}} = 0.00189 (Q_{\text{LFG}}) C_{\text{NMOC}}$$

where:

M_{NMOC} = mass emission rate of NMOC, megagrams per year;

Q_{LFG} = flow rate of landfill gas, cubic meters per minute; and

C_{NMOC} = NMOC concentration, parts per million by volume as hexane.

- a. The flow rate of landfill gas, Q_{LFG} , shall be determined by measuring the total landfill gas flow rate at the common header pipe that leads to the control device using a gas flow measuring device calibrated according to the provisions of section 4 of Method 2E of Appendix A of 40 CFR, Part 60.
- b. The average NMOC concentration, C_{NMOC} , shall be determined by collecting and analyzing landfill gas sampled from the common header pipe before the gas moving or condensate removal equipment using the procedures in Method 25C or Method 18 from 40 CFR Part 60, Appendix A. If using Method 18, the minimum list of compounds to be tested shall be those published in the most recent Compilation of Air Pollutant Emission Factors (AP-42). The sample location on the common header pipe shall be before any condensate removal or other gas refining units. The landfill owner or operator shall divide the NMOC concentration from Method 25C by six to convert from C_{NMOC} as carbon to C_{NMOC} as hexane.
- c. The permittee may use another method to determine landfill gas flow rate and NMOC concentration if the method has been approved by the Administrator of the U.S. Environmental Protection Agency.
- (2) The permittee shall maintain the following instrumentation specifications and procedures in order to demonstrate compliance with surface methane monitoring:
- a. The portable analyzer for surface methane shall meet the instrument specifications provided in section 3 of Method 21 of Appendix A of 40 CFR Part 60, except that "methane" shall replace all references to VOC.
- b. The calibration gas shall be methane, diluted to a nominal concentration of 500 parts per million in air.



- c. To meet the performance evaluation requirements in section 3.1.3 of Method 21 of Appendix A of 40 CFR Part 60, the instrument evaluation procedures of section 4.4 of Method 21 of Appendix A of 40 CFR Part 60 shall be used.
 - d. The calibration procedures provided in section 4.2 of Method 21 of Appendix A of 40 CFR Part 60 shall be followed immediately before commencing a surface monitoring survey.
- (3) The permittee shall maintain the following information for the life of the control equipment (recovery and treatment system and/or flare) as measured during the initial performance test or compliance demonstration:

- a. the maximum expected gas generation flow rate, in cubic meters/year as calculated based on the following:

- i. For sites with unknown year-to-year solid waste acceptance rate:

$$Q_m = 2L_o \times R \times \{(e^{-kc}) - (e^{-kt})\}$$

where:

Q_m = maximum expected gas generation flow rate, cubic meters per year;

L_o = methane generation potential, cubic meters per megagram solid waste;

R = average annual acceptance rate, megagram per year;

k = methane generation rate constant, per year;

t = age of the landfill at equipment installation plus the time the owner or operator intends to use the gas mover equipment or active life of the landfill, whichever is less (if the equipment is installed after closure, t is the age of the landfill at installation), years; and

c = time since closure, years (for an active landfill $c = 0$ and $e^{-kc} = 1$).

- ii. For sites with known year-to-year solid waste acceptance rate:

$$Q_m = \sum_{i=1} 2kL_oM_i \times (e^{-kti})$$

$i=1$

where:

Q_m = maximum expected gas generation flow rate, cubic meters per year;

k = methane generation rate constant, per year;



L_o = methane generation potential, cubic meters per megagram solid waste;

M_i = mass of solid waste in the i^{th} section, in megagrams; and

t_i = age of the i^{th} section, in years.

- iii. If a collection and control system has been installed, actual flow data may be used to project the maximum expected gas generation flow rate instead of, or in conjunction with, the equations above. If the landfill is still accepting waste, the actual measured flow data will not equal the maximum expected gas generation rate, so calculations using either of the equations above or other methods shall be used to predict the maximum expected gas generation rate over the intended period of use of the gas control system equipment. (The permittee may use another method to determine the maximum gas generation flow rate, if the method has been approved by the Ohio EPA.)
 - b. For the purposes of determining sufficient density of gas collectors for compliance with a collection system designed to handle the maximum expected landfill gas flow rate, the permittee shall design a system of vertical wells, capable of controlling and extracting gas from all portions of the landfill sufficient to meet all operational and performance standards.
- (4) The nitrogen or oxygen concentration shall be monitored at each landfill gas collection well as required in this permit and shall be determined as follows:
- a. The nitrogen level shall be determined using Method 3C from 40 CFR Part 60, Appendix A, unless an alternative test method is approved by the Director.
 - b. The oxygen level shall be determined by an oxygen meter using Method 3A or 3C from 40 CFR Part 60, Appendix A, unless an alternative test method is approved by the Director, except that:
 - i. the span shall be set so that the regulatory limit is between 20 and 50 percent of the span;
 - ii. a data recorder is not required;
 - iii. only two calibration gases are required, a zero and span, and ambient air may be used as the span;
 - iv. a calibration error check is not required; and
 - v. the allowable sample bias, zero drift, and calibration drift are plus or minus 10 percent.
- (5) The net heating value of the landfill gas being combusted at the flare shall be calculated as follows:

n



$$H_T = \sum_{i=1}^3 C_i H_i$$

where:

H_T = net heating value of the sample, MJ/scm; where the net enthalpy per mole of off gas is based on combustion at 25 degrees Celsius and 760 mm Hg, but the standard temperature of 20 degrees Celsius is used for determining the volume corresponding to one mole;

k = constant, 1.740×10^{-7} (1/ppm) (g mole/scm) (MJ/kcal), where the standard temperature for Δ g mole/scm@ is 20 degrees Celsius;

C_i = concentration of sample component Δ i@ in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946-90; and

H_i = net heat of combustion of sample component Δ i@, kcal/g mole at 25 degrees Celsius and 760 mm Hg. The heats of combustion may be determined using ASTM D4809-95 (incorporated by reference as specified in 40 CFR 60.17) if published values are not available or cannot be calculated.

The conversion factor of Δ 26.84 Btu scm/MJ scf@ can be used to convert the net heating value of the gas (H_T) from MJ/scm to Btu/scf.

- (6) The actual exit velocity of the flare shall be determined by dividing the volumetric flow rate (in units of standard temperature and pressure) of the flare header or headers that feed the flare, as determined by Reference Methods 2, 2A, 2C, or 2D, as appropriate, by the unobstructed (free) cross sectional area of the flare tip.

The conversion factor of Δ 3.281 ft/m@ can be used to convert the velocity from m/sec to ft/sec.

- (7) Compliance with the allowable emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible emissions of non-asbestos fugitive dust (load-in and wind erosion) from this emissions unit shall not exceed 20 percent (%) opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance 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"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03(B)(3).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: 02-22526
Facility ID: 0250070850
Effective Date: 12/22/2008

b. Emission Limitation:

0.15 lb of CO/mmBtu; 25.5 lbs of CO/hour (per 6,000 ft³/min combustor)



Applicable Compliance Method:

Compliance shall be demonstrated by using 40 CFR, Part 60, Appendix A, Method 10.

0.15 lb CO/mmBtu is a manufacturer's emission factor for this combustor.

$$PPH = EF \times F \times HV \times 60/10^6$$

where:

PPH = emissions, lbs/hr;

EF = emission factor, lb/mmBtu;

F = flow rate of LFG to combustor, ft³/min;

HV = heating value of LFG, 473 Btu/ft³;

60 = conversion factor, minute/hour; and

10⁶ = conversion factor, Btu/mmBtu.

c. Emission Limitation:

0.06 lb of NO_x/mmBtu; 10.2 lbs of NO_x/hour (per 6,000 ft³/min combustor)

Applicable Compliance Method:

Compliance shall be demonstrated by using 40 CFR, Part 60, Appendix A, Method 7 or 7E.

0.06 lb/mmBtu is a manufacturer's emission factor for this combustor.

$$PPH = EF \times F \times HV \times 60/10^6$$

where:

PPH = emissions, lb/hr;

EF = emission factor, lb/mmBtu;

F = flow rate of LFG to combustor, ft³/min;

HV = heating value of LFG, 473 Btu/ft³;

60 = conversion factor, minute/hour; and

10⁶ = conversion factor, Btu/mmBtu.

d. Emission Limitation:

2.8 lbs of SO₂/hour (per 6,000 ft³/min combustor)



Applicable Compliance Method:

Compliance shall be demonstrated by using the following equation:

$$E = (Q \times 60 \times C \times 64 \times 1) / (R \times T \times 10^6)$$

where:

E = emission rate, lb/hr;

Q = flow rate of combustor, ft³/min;

60 = conversion, minutes per hour;

C = concentration of sulfur in LFG, AP-42, Section 2.4 MSW Landfills, uses a default value of 46.9 ppmv;

64 = molecular weight of SO₂, lb/lbmole;

1 = pressure, atm;

R = gas constant, 0.7302 atm ft³/lbmole °R;

T = temperature of LFG, 520 degrees °R; and

10⁶ = conversion factor for ppmv.

e. Emission Limitation:

1.5 lbs of HCl/hour (per 6,000 ft³/min combustor)

Applicable Compliance Method:

If required, compliance shall be demonstrated by using 40 CFR, Part 60, Appendix A, Method 26.

$$E = (F \times 60 \times C \times 36.5 \times 1) / (0.7302 \times T \times 10^6)$$

where:

E = emission rate, lb/hour;

F = flow rate of combustor, ft³/min;

60 = conversion, minutes per hour;

C = concentration of HCl in LFG, AP-42, Section 2.4 MSW Landfills, uses a default value of 42.0 ppmv;

36.5 = molecular weight, lb/lbmole;

1 = pressure, atm;



0.7302 = gas constant, atm ft³/lbmole °R);

T = temperature of LFG, 520 degrees °R; and

10⁶ = conversion factor for ppmv.

f. Emission Limitation:

3.2 lbs of PM₁₀ /hour (per 6,000 ft³/min combustor)

Applicable Compliance Method:

If required, compliance shall be demonstrated by using 40 CFR, Part 60, Appendix A, Method 5.

$$E = EF \times F \times PM \times 60$$

where:

E = emission rate, lb/hr;

EF = emission factor from AP-42, Section 2.4 MSW Landfills, 17 lbs/10⁶ ft³ of CH₄;

F = flow rate of combustor, ft³/min;

PM = fractional portion of LFG that is CH₄, 0.52; and

60 = conversion factor, minute/hour.

g. Emission Limitations:

111.7 tons of CO/year per 6,000 ft³/min combustor

44.7 tons of NO_x/year per 6,000 ft³/min combustor

12.3 tons of SO₂/year per 6,000 ft³/min combustor

6.6 tons of HCl/year per 6,000 ft³/min combustor

14.0 tons of PM₁₀/year per 6,000 ft³/min combustor

Applicable Compliance Method:

The annual emission limits are based on the hourly emission limits multiplied by 8,760 hours per year and divided by 2,000 pounds per ton. Therefore, compliance with the annual emission limits are assumed provided compliance with the respective hourly emission limits is maintained.

h. Emission Limitation:

11.35 tons of fugitive PE/year



Applicable Compliance Method:

Compliance shall be demonstrated by using the following equations from AP-42, Section 13.2.4 Aggregate Handling and Storage Piles.

$$E_t = E_1 + E_2$$

where:

E_t = total fugitive particulate emissions from landfill, TPY;

E_1 = emissions from landfill operations, TPY; and

E_2 = emission from wind erosion, TPY.

$$E_1 = k \times 0.0032 [(U/5)^{1.3}/(M/2)^{1.4}] \times T / 2,000$$

where:

U = mean wind speed, mph (assumed 10);

M = material moisture content, % (per Table 13.2.4-1, M=12);

0.0032 = equation constant;

k = particle size multiplier, size 30 microns (0.74);

T = tonnage handled, no more than 4,015,000 tons/yr; and

2,000 = lbs/ton.

$$E_2 = [1.7 \times (s/1.5) \times [(365-p)/235] \times (f/15)] \times A \times (365 / 2,000) \times (1 - CE)$$

where:

s = silt content, % (per Table 13.2.4, s= 9%);

p = # of days with <0.01 inch of precipitation (per Figure 13.2.2-1, p=150 days);

f = % of time wind speed exceeds 12 mph, % (assume 20);

A = area of landfill that is actively being worked, no more than 10 acres;

365 = days/year;

2,000 = lbs/ton; and

CE = fractional control efficiency (0.50).



i. Emission Limitation:

132.7 tons of fugitive NMOC/year

Applicable Compliance Method:

Compliance shall be demonstrated based on the following equation:

$$E = F \times (1 - PC)$$

where:

E = emissions of fugitive NMOC, TPY;

F = total flowrate of NMOC at peak year, as predicted by LANDGEM model, 530.7 TPY; and

PC = estimated fractional capture efficiency of NMOC by collection/control system.

j. Emission Limitation:

30.5 tons of fugitive HAPs/year

Applicable Compliance Method:

Compliance shall be demonstrated based on the following equation:

$$E = F \times (1 - PC)$$

where:

E = emissions of fugitive HAP, TPY;

F = total flowrate of NMOC at peak year, as predicted by LANDGEM model, 121.8 TPY; and

PC = estimated fractional capture efficiency of HAPs by collection/control system.

k. Emission Limitation:

20,750 tons of fugitive CH₄/year

Applicable Compliance Method:

Compliance shall be demonstrated based on the following equation:

$$E = F \times (1 - PC)$$

where:

E = emissions of fugitive CH₄, TPY;



F = total flowrate of CH₄ at peak year, as predicted by LANDGEM model, 83,000 TPY; and

PC = estimated fractional capture efficiency of HAPs by collection/control system.

I. Emission Limitation:

Visible emissions shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated by using 40 CFR, Part 60, Appendix A, Method 9.

(8) The permittee shall conduct, or have conducted, emission testing for the enclosed combustors in accordance with the following requirements:

a. The emission testing for the new combustor shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit. The emission testing for the previously installed flare shall be performed within 1 year after the effective date of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable concentration of NO_x and CO in the exhaust stream and to demonstrate compliance with the allowable destruction efficiency for NMOC.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

for NO_x - Method 7 or 7E of 40 CFR Part 60, Appendix A;

for CO - Method 10 of 40 CFR Part 60, Appendix A; and

for NMOC - Method 25 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. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the OhioEPA Northeast District Office.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).



- f. Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.
- g) Miscellaneous Requirements
- (1) This permit to install for emissions unit F002 supercedes PTI 02-6718 issued on July 20, 1994.