



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

11/02/2022

Elizabeth Bertha
 West Point Renewables, LLC
 P.O. Box 1080
 Mars, PA 16046

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0215000300
 Permit Number: P0129123
 Permit Type: Initial Installation
 County: Columbiana

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Morning Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) website here: <https://epa.ohio.gov/dapc/permitsonline>. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northeast District Office
 2110 East Aurora Rd.
 Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

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

cc: U.S. EPA Region 5 *Via E-Mail Notification*
 Ohio EPA-NEDO; Pennsylvania; West Virginia

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate Initial Installation
West Point Renewables, LLC
13629 WHITE RD

Lisbon, OH 44432

ID#: P0129123
Date of Action: 11/02/2022
Permit Desc: Installation PTIO for a municipal solid waste landfill and associated roadways.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://epa.ohio.gov/dapc/permitsonline> by entering the ID # or: Jana Gannon, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Rd., Twinsburg, OH 44087. Ph: (330)963-1200



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
West Point Renewables, LLC**

Facility ID:	0215000300
Permit Number:	P0129123
Permit Type:	Initial Installation
Issued:	11/02/2022
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
West Point Renewables, LLC

Table of Contents

Authorization	1
List of Commonly Used Abbreviations	3
A. Standard Terms and Conditions	4
1. What does this permit-to-install and operate (PTIO) allow me to do?	5
2. Who is responsible for complying with this permit?	5
3. What records must I keep under this permit?	5
4. What are my permit fees and when do I pay them?	5
5. When does my PTIO expire, and when do I need to submit my renewal application?	5
6. What happens to this permit if my project is delayed or I do not install or modify my source?	6
7. What reports must I submit under this permit?	6
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit?	6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?	7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?	7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently?	7
13. Can I transfer this permit to a new owner or operator?	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?	8
15. What happens if a portion of this permit is determined to be invalid?	8
B. Facility-Wide Terms and Conditions	9
C. Emissions Unit Terms and Conditions	11
1. F013, Roadways	12
2. P901, Municipal Solid Waste Landfill	16



Draft Permit-to-Install and Operate

West Point Renewables, LLC

Permit Number: P0129123

Facility ID: 0215000300

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0215000300
Application Number(s): A0067217, A0069243, A0070430
Permit Number: P0129123
Permit Description: Installation PTIO for a municipal solid waste landfill and associated roadways.
Permit Type: Initial Installation
Permit Fee: \$1,450.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/02/2022
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

West Point Renewables, LLC
13629 WHITE RD
Lisbon, OH 44432

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

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Rd.
Twinsburg, OH 44087
(330)963-1200

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Laurie A. Stevenson
Director



Draft Permit-to-Install and Operate

West Point Renewables, LLC

Permit Number: P0129123

Facility ID: 0215000300

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0129123

Permit Description: Installation PTIO for a municipal solid waste landfill and associated roadways.

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

Emissions Unit ID: F013

Company Equipment ID: 102

Superseded Permit Number:

General Permit Category and Type: Not Applicable

Emissions Unit ID: P901

Company Equipment ID: 101

Superseded Permit Number:

General Permit Category and Type: Not Applicable

List of Commonly Used Abbreviations

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



Draft Permit-to-Install and Operate

West Point Renewables, LLC

Permit Number: P0129123

Facility ID: 0215000300

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall assume the responsibilities of the transferor permit holder.



Draft Permit-to-Install and Operate

West Point Renewables, LLC

Permit Number: P0129123

Facility ID: 0215000300

Effective Date: To be entered upon final issuance

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

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

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

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



Draft Permit-to-Install and Operate

West Point Renewables, LLC

Permit Number: P0129123

Facility ID: 0215000300

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

West Point Renewables, LLC

Permit Number: P0129123

Facility ID: 0215000300

Effective Date: To be entered upon final issuance

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

a) None.

2. The following EU contained in this permit is subject to 40 CFR Part 60, Subpart XXX, Standards of Performance for New Stationary Sources for MSW Landfills that Commenced Construction, Reconstruction, or Modification after July 17, 2014: P901. The complete NSPS requirements, including the Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website at <http://www.ecfr.gov> or by contacting the OEPA Northeast DO (NEDO).

The permittee must comply with all applicable requirements of 40 CFR Part 60, Subpart XXX. The permittee shall also comply with all applicable requirements of 40 CFR Part 60, Subpart A (General Provisions). Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 60, Subpart XXX and Subpart A.

3. The following EU contained in this permit is subject to 40 CFR Part 63, Subpart AAAA, NESHAP for MSW Landfills: P901. The complete NESHAP requirements, including the Subpart A General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website at <http://www.ecfr.gov> or by contacting the OEPA NEDO.

The permittee must comply with all applicable requirements of 40 CFR Part 63, Subpart AAAA. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 1 of 40 CFR Part 63, Subpart AAAA. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart AAAA and Subpart A.



Draft Permit-to-Install and Operate

West Point Renewables, LLC

Permit Number: P0129123

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C. Emissions Unit Terms and Conditions

1. F013, Roadways

Operations, Property and/or Equipment Description:

Paved and Unpaved Roadway Traffic for Landfill (estimated 190,000 Vehicle Miles Traffic per Year)

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Develop and implement a site-specific work practice plan designed as described in paragraph d)(1) below to minimize or eliminate fugitive dust emissions.
b.	OAC rule 3745-17-07(B)(4)	No visible PE from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period.
c.	OAC rule 3745-17-07(B)(5)	No visible PE from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period.
d.	OAC rule 3745-17-08(B)	See b)(2)a.

(2) Additional Terms and Conditions

- a. For EUs located in Appendix A areas, the permittee shall employ RACM to minimize or eliminate visible PE of fugitive dust by:
 - i. The periodic application of asphalt, oil (excluding any used oil as defined in paragraph (A)(12) of rule 3745-279-01 of the Administrative Code), water or other suitable dust suppression chemicals on gravel roads and parking lots.
 - ii. The prompt removal, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
 - iii. Requiring open-bodied vehicles transporting materials likely to become airborne to have such materials covered at all times if the control measure is necessary for the materials being transported.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Work Practice Plan

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

- a. An identification of each roadway or parking area, or segment of roadway or parking area, for which the plan applies. The permittee can select whether to develop a plan based on segments or entire roads.
- b. A determination of the frequency that each roadway, parking area or segment will be inspected to determine if additional control measures are needed. The frequency of inspection can either be common for all segments of the roadway or parking areas or may be identified separately for various segments of the roadway or parking areas.
- c. The identification of the record keeping form/record that will be used to track the inspection and treatment of the roadways. This form/record should include, at a minimum, the following elements:
 - i. Roadway, parking area, or segment inspected;
 - ii. Date inspected;
 - iii. Name of employee responsible for inspection;

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

The permittee shall begin using the Work Practice Plan within 30 days from the date OEPA approved the initial plan. As needs warrant, the permittee can modify the Work Practice Plan. The permittee shall submit a copy of proposed revisions to the Work Practice Plan to the OEPA NEDO for review and approval. The permittee can begin using the revised Work Practice Plan once the OEPA NEDO has approved its use.

(2) Work Practice Plan Inspections

Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas at frequencies described in the Work Practice Plan. The purpose of the inspections is to determine the need for implementing control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(3) Work Practice Plan Record Keeping

The permittee shall maintain records of the following information:

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

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

e) Reporting Requirements

- (1) Within 30 days from the final issuance of this permit, the permittee shall submit their proposed Work Practice Plan to the OEPA NEDO.
- (2) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:



Draft Permit-to-Install and Operate

West Point Renewables, LLC

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- a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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

- a. Emission Limitation:

- b. No visible PE from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period.

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

Applicable Compliance Method:

If required, compliance with the applicable visible PE limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.

2. P901, Municipal Solid Waste Landfill

Operations, Property and/or Equipment Description:

Municipal Solid Waste Landfill emissions consists of Landfill Flare, Fugitives from Landfill gas, and Fugitives from Construction Activities part of the Landfill Working Face

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T) OAC rule 3745-31-05(A)(3)	<p>Emissions from the landfill operation shall not exceed:</p> <p>Install an active gas collection system that is designed to meet the requirements of 40 CFR Part 60, Subpart XXX.</p> <p>Work practice standards that are sufficient to minimize or eliminate PE and fugitive landfill gas emissions (VOC).</p> <p>Best available control measures that are sufficient to minimize or eliminate VE of fugitive dust [See b)(2)a. - b)(2)e.]</p>



Draft Permit-to-Install and Operate

West Point Renewables, LLC

Permit Number: P0129123

Facility ID: 0215000300

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Fugitive landfill gas emissions (VOC) shall not exceed 1.83 tons per month averaged over a 12-month rolling period.</p> <p>Emissions from the 3,900 ft³/min enclosed combustor shall not exceed:</p> <p>Designed to meet NOx emissions of 0.06 lb/MMBtu of actual heat input.</p> <p>Designed to meet CO emissions of 0.15 lb/MMBtu of actual heat input.</p> <p>Achieve a minimum destruction efficiency of 98% for VOC.</p> <p>See b)(2)t.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions of SO ₂ from this air contaminant source since the uncontrolled PTE is less than 10 TPY.
c.	<p>40 CFR Part 60, Subpart XXX (40 CFR 60.760 through 60.769)</p> <p>(In accordance with 40 CFR 60.760 and 60.762, this facility is a municipal solid waste landfill that commenced construction, reconstruction or modification after July 17, 2014, has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million m³ and has estimated uncontrolled emissions equal to or greater than 34 Mg/yr NMOC)</p>	See b)(2)h. - b)(2)o.
d.	<p>40 CFR Part 63, Subpart AAAA (40 CFR 63.1930 through 63.1990)</p> <p>(In accordance with 40 CFR 63.1935 this facility is a municipal solid waste landfill that has accepted waste since November 8, 1987, and is an area source landfill that has a design capacity equal to or greater than 2.5 million Mg and 2.5 million m³ and has estimated uncontrolled emissions</p>	See b)(2)p. – b)(2)q.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	equal to or greater than 50 Mg/yr NMOC)	
e.	40 CFR Part 63, Subpart A (40 CFR 63.6.1-16)	Table 1 to 40 CFR Part 63, Subpart AAAA designates which sections of 40 CFR Part 63, Subpart A (General Provisions) apply.
f.	OAC rule 3745-17-08(B)	See b)(2)a – b)(2)e.
g.	OAC rule 3745-17-07	Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average. Visible PE from the enclosed combustor stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
h.	OAC rule 3745-19	See b)(2)f.
i.	ORC 3704.03(L)	See b)(2)g.
j.	ORC 3704.03(F)(4)(d)	See d)(11) – d)(14) and e)(5).

(2) Additional Terms and Conditions

- a. The permittee shall ensure that solid wastes are deposited, spread, and compacted in such a manner as to minimize or prevent VE 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 waste loads that would potentially exceed the VE limit shall be watered as necessary prior to or during dumping operations in order to minimize or eliminate VE 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.
- b. The following material handling activities are covered by this permit and are subject to the above-mentioned work practices and control measures specified in b)(1)a. and the VE limitations specified in b)(1)g., above:
 - i. daily cover and handling and placement;
 - ii. solid waste handling (dumping);
 - iii. spreading, grading and compaction;
 - iv. truck loading and unloading;
 - v. soil transport; and
 - vi. storage pile activities (loading, unloading, wind erosion).

- c. The permittee shall employ RACM for the above-identified landfill fugitive dust operations/sources for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to control fugitive PE. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the fugitive dust operation/sources until further observation confirms that use of the control measure(s) is unnecessary. Implementation of the control measures shall not be necessary for fugitive dust sources which are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- e. 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.
- f. There shall be no open burning, in violation of OAC Chapter 3745-19, at this facility.
- g. Pursuant to the authority in ORC section 3704.03(L) and OAC rule 3745-77-07(C)(2), 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.
- h. Per 40 CFR 60.762(b), the owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million Mg and 2.5 million m³, shall either comply with 40 CFR 60.672(b)(2) or calculate an NMOC emission rate for the landfill using the procedures specified in 40 CFR 60.764. The NMOC emission rate shall be recalculated annually, except as provided in 40 CFR 60.767(b)(1)(ii).
- i. Per 40 CFR 60.762(b)(2)(i), since the NMOC emission rate has been calculated to exceed 34 Mg/yr, the permittee shall either: submit a collection and control system design plan prepared by a professional engineer within one year from the due date of the first NMOC emission rate report in which the NMOC emission rate equals or exceeds 34 Mg/yr, except as specified in 40 CFR 60.767(c)(4); calculate NMOC emissions using the next higher tier in 40 CFR 60.764; or conduct a surface emission monitoring demonstration using the procedures specified in 40 CFR 60.764(a)(6).

- j. Per 40 CFR 60.762(b)(2)(ii)(A) and (B), the collection and control system shall be installed within 30 months after: the first annual report in which the NMOC emission rate equals or exceeds 34 Mg/yr, unless Tier 2 or Tier 3 sampling demonstrates that the NMOC emission rate is less than 34 Mg/yr, as specified in 40 CFR 60.767(c)(4); or the most recent NMOC emission rate report in which the NMOC emission rate equals or exceeds 34 Mg/yr based on Tier 2, if the Tier 4 surface emissions monitoring shows a surface methane emission concentration of 500 ppm methane or greater as specified in 40 CFR 60.767(c)(4)(iii).
- k. Per 40 CFR 60.762(b)(2)(ii)(C) and (D), the landfill gas collection system shall satisfy the following requirements:
 - i. 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 equipment;
 - ii. 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. collect gas at a sufficient extraction rate;
 - iv. if an active collection system, be designed to minimize off-site migration of subsurface gas; and
 - v. if a passive collection system, be installed with liners on the bottom and all sides in all areas in which gas is to be collected. The liners shall be installed as required under 40 CFR 258.40.
- l. Per 40 CFR 60.762(b)(2)(iii), the collection and control system shall route all the collected gas to one of the following control devices:
 - i. A non-enclosed flare designed and operated in accordance with the parameters established in 40 CFR 60.18, except as noted in 40 CFR 60.764(e); or
 - ii. a control system designed and operated to reduce NMOC by 98 weight-percent, or, when an enclosed combustion device is used for control, to either reduce NMOC by 98 weight percent or reduce the outlet NMOC concentration to less than 20 ppm by volume, dry basis as hexane at 3% oxygen. The reduction efficiency or ppm by volume shall be established by an initial performance test to be completed no later than 180 days after the initial startup of the approved control system, using the test methods specified in 40 CFR 60.764(d). The control device shall be operated within the parameter ranges established during the initial or most recent performance test. The operating parameters to be monitored are specified in 40 CFR 60.766; or
 - iii. a treatment system that processes the collected gas for subsequent sale or beneficial use, such as fuel for combustion, production of vehicle fuel,



production of high-Btu gas for pipeline injection, or use as a raw material in a chemical manufacturing process. Venting of treated landfill gas to the ambient air shall not be allowed. If the treated landfill gas cannot be routed for subsequent sale or beneficial use, then the treated landfill gas shall be controlled according to i. or ii. above.

All emissions from any atmospheric vent from the gas treatment system are subject to the requirements of i. or ii. Atmospheric vents located on the condensate storage tank are not part of the treatment system and are exempt from the requirements of i. or ii.

- m. Per 40 CFR 60.762(b)(2)(iv), operate the collection and control device installed to comply with 40 CFR 60, Subpart XXX in accordance with the provisions of 40 CFR 60.763, 60.765, and 60.766; or the provisions of 40 CFR 63.1958, 63.1960, and 63.1961. Once the permittee begins to comply with the provisions of 40 CFR 63.1958, 63.1960, and 63.1961, the permittee shall continue to operate the collection and control device according to those provisions.
- n. Per 40 CFR 60.7659(e), the provisions of 40 CFR 60, Subpart XXX apply at all times, including periods of startup, shutdown or malfunction. During periods of startup, shutdown and malfunction, the permittee shall comply with the work practice specified in 40 CFR 60.763(e) in lieu of the compliance provisions in 40 CFR 60.765.
- o. The permittee shall comply with the applicable restrictions of 40 CFR Part 60, Subpart XXX:

40 CFR 60.762(b)(2)(ii)(C)	Active collection system installation requirements
40 CFR 60.762(b)(2)(D) and 40 CFR 258.40	Passive collection system installation requirements
40 CFR 60.762(b)(2)(iii) and 60.18	Control system design and operating requirements
40 CFR 60.762(b)(2)(v) and 60.764(b)	Collection and control system capping, removing, or decommissioning requirements
40 CFR 60.765(b)	Timeline for placement of wells
40 CFR 60.769	Active collection system specifications

- p. In accordance with 40 CFR 63.1935, this EU is located at a MSW landfill facility that is an area source with controls as defined in 40 CFR 63.2 of Subpart A that has a design capacity equal to or greater than 2.5 million Mg and 2.5 million m³ and has estimated uncontrolled emissions equal to or greater than 50 Mg/yr NMOC. Therefore, it is subject to the emissions limitations/control measures specified in 40 CFR Part 63, Subpart AAAA – NESHAP: MSW Landfills.

- q. The permittee shall comply with the applicable restrictions of 40 CFR Part 63, Subpart AAAAA:

40 CFR 63.1930(a); 63.1964(a); and Table 1 to 40 CFR Part 63, Subpart AAAA	Before 09/28/2021, develop and implement a written SSMP
40 CFR 63.1964(b)	After 09/27/2021, the SSM provisions and plan no longer apply
40 CFR 63.1930(b)	Meet requirements of 40 CFR Part 63, Subpart AAAAA no later than 09/27/2021
40 CFR 63.1955(a)	Before 09/28/21, approved alternatives to the operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping, or reporting provisions under 40 CFR Part 60, Subpart XXX can be used to comply with 40 CFR Part 63, Subpart AAAAA
40 CFR 63.1959(b)(2)(ii)(B)	Active collection system installation requirements
40 CFR 63.1959(b)(2)(ii)(C)	Passive collection system installation requirements
40 CFR 63.1959(b)(2)(iii)	Control system design and operating requirements
40 CFR 63.1960(b)	Timeline for placement of wells
40 CFR 63.1962	Specification for active collection systems

- s. The emission limitation(s) for the control device(s) have been established based upon the permittee’s potential to emit as predicted by US EPA’s LFG estimation program (LANDGEM), AP-42 emission factors, and accepted industry assumptions. These maximum, worst-case emissions are expected to occur after the seventh year of operation and only if the facility were to accept the specified maximum daily waste each day of 4,000 tons per day. The facility has committed to installing an additional control device and/or a larger capacity control device and/or sending a portion of the LFG to a treatment system within 180 days of triggering both “i” and “ii”, below, and also to submitting a permit modification application:

- i. sustained average total flow rate (scf/min) which is greater than 90% of the total capacity of the commissioned control device(s); and
- ii. the collection system shall be expanded in accordance with 40 CFR 60.763 within 180 days, when the newly collected LFG volume exceeds/its anticipated to exceed the control device capacity.

- t. The fugitive VOC emission limitation represents the VOC portion of the fugitive NMOC emission rate from the landfill. For the purpose of this permit and federal enforceability, NMOC emissions have been converted to VOC by applying the AP-42 Chapter 2.4 (11/98) conversion rate of 39% to the predicted NMOC emission rate from the Landfill Gas Emission Model (LandGEM). An NMOC emission limit was not established under this rule because there is not an established NAAQS associated with NMOC. 40 CFR 60.760 et seq. (NSPS, Subpart XXX) addresses NMOC emissions; therefore, the monitoring, record keeping, and reporting requirements of this permit will reflect NMOC rather than VOC.
 - u. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM-10 and SO₂ emissions from this air contaminant source since the uncontrolled PTE are less than 10 TPY.
- c) Operational Restrictions
- (1) The enclosed flare shall be operated with a flame present at all times when gases are vented to it.
 - (2) An automatic flame ignition system shall be installed in the enclosed flare. The presence of a pilot flame shall be monitored using a thermocouple or other equivalent device to detect the presence of a flame. A pilot flame shall be maintained at all times in the flare's pilot light burner. If the pilot flame goes out and does not relight, then an alarm shall sound.
 - (3) The flare, its auto ignition system, and its recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
 - (4) The permittee shall operate the control system at all times when the collected LFG is routed to the system.
 - (5) The facility cannot accept for disposal any regulated asbestos-containing material as defined in the NESHAP for Asbestos, 40 CFR Part 61, Subpart M, Section 141, and OAC rule 3745-20, or any subsequent revisions to either rule. Regulated asbestos-containing material is defined to include:
 - a. friable asbestos material;
 - b. category I, nonfriable asbestos-containing material that has become friable;
 - c. category II, nonfriable asbestos-containing material that will be or has been subject to sanding, grinding, cutting, or abrading; or
 - d. category II, nonfriable asbestos-containing material that has a high-probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.
 - (6) See 40 CFR Part 60, Subpart XXX (40 CFR 60.760 - 60.769).
 - (7) See 40 CFR Part 63, Subpart AAAA (40 CFR 63.1930 – 1990).

- (8) The maximum daily waste receipt rate for this EU shall not exceed 4,000 tons of total waste.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) associated with the enclosed flare contained in this permit, the acceptable operating temperature within the enclosed flare, shall not be more than 82 degrees Fahrenheit below the average combustion temperature measured during the most recent compliant stack test based on a 3-hour average. Until compliance testing has been conducted, the enclosed flare shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
- (2) The permittee shall properly install, operate, and maintain continuous temperature monitors and recorder(s) that measure and record(s) the operating temperature within the enclosed flare. The permittee shall record the operating temperature on a continuous basis as a 3-hour block average. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. These records shall be maintained at the facility for a period of no less than 5 years.
- (3) Whenever the 3-hour average operating temperature within the enclosed flare deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. The date and time the deviation began;
 - b. The magnitude of the deviation at that time;
 - c. The date the investigation was conducted;
 - d. The name(s) of the personnel who conducted the investigation; and
 - e. The findings and recommendations.

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

- f. A description of the corrective action;
- g. The date corrective action was completed;
- h. The date and time the deviation ended;

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

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

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the OEPA NEDO. The permittee may request revisions to the permitted minimum temperature limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (4) The permittee shall perform daily checks, when the EU is in operation and when the weather conditions allow, for any visible PE from the stack serving this EU. The presence or absence of any VE shall be noted in an operations log. If VE are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any VE incident; and
 - e. any corrective actions taken to minimize or eliminate the VE.

If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under term d. above or continue the daily check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations or specify the minor corrective actions that were taken to ensure that the EU continued to operate under normal conditions or specify the corrective actions that were taken to eliminate abnormal VE.

- (5) The permittee shall record all periods of time during which a pilot flame was not present when LFG is vented to the enclosed flare, or all periods of time when the flare was inoperable.

- (6) The permittee shall perform inspections of the landfill operation areas daily.

The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for fugitive PE. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a landfill fugitive dust operation/source that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified event(s) shall be performed as soon as such event(s) has (have) ended, except if the next inspection is within one week.

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

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 or due to the facility being closed;
- 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 control measures were required but not implemented.

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

- (8) The permittee shall maintain monthly records of the amount of LFG (scf) input to the enclosed flare.
- (9) See 40 CFR Part 60, Subpart XXX (40 CFR 60.760 – 60.769).
- (10) See 40 CFR Part 63, Subpart AAAA (40 CFR 63.1930 – 1990).
- (11) The PTI application for this/these EU(s), P901, was evaluated based on the actual materials and the design parameters of the EU's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these EU(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 OEPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was

compared to the MAGLC, calculated as described in the OEPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the EU(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. TLV from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the EU(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the 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 TPY) or "worst case" toxic contaminant(s):

Toxic Contaminant: Hydrogen chloride

TLV (mg/m³): 2.98

Maximum Hourly Emission Rate (lbs/hr): 1.584

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 16.4

MAGLC (ug/m³): 52.3

The permittee has demonstrated that emissions of hydrogen chloride, from EU(s) P901, is calculated to be less than eighty per cent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (12) Prior to making any physical changes to or changes in the method of operation of the EU(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the

parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower 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 EU(s) or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the OEPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the EU, 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.

- (13) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the EU(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the EU(s) or the materials applied.

- (14) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (15) The permittee shall classify each load of waste received by waste code and record the weight received for each waste code daily, in tons, along with a summation of the total waste received each day.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. Each period of time (start time and date, and end time and date) when the operating temperature within the enclosed flare was outside of the range specified by the manufacturer and/or outside of the acceptable range established during the performance test;
 - b. Any period of time (start time and date, and end time and date) when the EU(s) was/were in operation and the process emissions were not vented to the enclosed flare;
 - c. Each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - d. Each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the EU(s) into compliance and/or the temperature within the enclosed flare into compliance with the acceptable range, was determined to be necessary and was not taken;
 - e. Each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s);
 - f. All periods of time during which the pilot flame was not functioning properly or the flare was not maintained as required in this permit. The reports shall include the date, time, and duration of each such period.
 - g. All days during which any visible PE were observed from the stack serving this EU;
 - h. Any day when the waste acceptance rate exceeded 4,000 tons per day;
 - i. Any corrective actions taken to minimize or eliminate the visible PE;
 - j. 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
 - k. Each instance when a control measure that was to be implemented as a result of an inspection was not implemented.

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

- (2) See 40 CFR Part 60, Subpart XXX (40 CFR 60.760 - 60.769).
- (3) See 40 CFR Part 63, Subpart AAAA (40 CFR 63.1930 – 1990).
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (5) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum concentration. The report should include:
 - b. the original model input;
 - c. the updated model input;
 - d. the reason for the change(s) to the input parameter(s);
 - e. a summary of the results of the updated modeling, including the input changes; and
 - f. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

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

f) Testing Requirements

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

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the minimum VOC destruction efficiency by conducting emission testing in accordance with the requirements of section f)(2).

b. Emission Limitation:

Enclosed flare shall be designed to meet PM₁₀ emissions of 15 lb/MMscf of methane.

Applicable Compliance Method:

The enclosed flare combustion emission limitations were established based on the emission factors from AP-42 Chapter 2.4, Municipal Solid Waste Landfills (10/08).

c. Emission Limitation:

Enclosed flare shall be designed to meet CO emissions of 0.15 lb/MMBtu of actual heat input

Applicable Compliance Method:

The enclosed flare combustion emission limitations were established based upon a manufacturer guaranteed emission factor. The permittee shall demonstrate compliance by conducting emission testing in accordance with the requirements of section f)(2).

d. Emission Limitation:

Enclosed flare shall be designed to meet NO_x emissions of 0.06 lb/MMBtu of actual heat input

Applicable Compliance Method:

The enclosed flare combustion emission limitations were established based upon a manufacturer guaranteed emission factor. The permittee shall demonstrate compliance by conducting emission testing in accordance with the requirements of section f)(2).

e. Emission Limitation:

Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average.

Visible PE from the enclosed combustor stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

- f. Emission Limitation:
- g. Fugitive VOC emissions shall not exceed 1.83 tons per month averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance shall be demonstrated based on the following equation:

$$E = F \times 39\% \times (1 - PC)/12$$

where:

E = emissions of fugitive VOC, in tons per month;

F = total emissions of NMOC at peak year 7, as predicted by LANDGEM model, 271.64 TPY, based on a maximum waste acceptance rate of 4,000 tons per day;

39% = the fractional portion of VOC in NMOC according to AP-42, Section 2.4 MSW Landfills, Table 2.4-2; and

PC = estimated fractional capture efficiency of NMOC by collection/control system, assumed to be 75%.

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

- (2) The permittee shall conduct, or have conducted, emission testing for this EU in accordance with the following requirements:
 - a. The emission testing shall be conducted within 180 days of commencing operation of the enclosed flare.
 - b. The emission testing shall be conducted to demonstrate compliance with the CO and NOx design specifications, the overall destruction efficiency for VOC and the reduction efficiency or ppm emission limitation for NMOC specified in 40 CFR Part 60 Subpart XXX and/or 40 CFR Part 63 Subpart AAAA.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):
 - CO – Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A;
 - NOx - Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A;
 - VOC - Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A; and
 - NMOC - If required, methods 1 through 4 and 25 or 25C of 40 CFR Part 60, Appendix A.

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

Per 40 CFR Part 60 Subpart XXX and 40 CFR Part 63 Subpart AAAA, EPA Method 25 or 25C (Method 25C may be used at the inlet only) of Appendix A-7 of 40 CFR Part 60 shall be used to determine compliance with the 98 weight-percent efficiency or the 20 parts per million by volume outlet concentration level, unless another method to demonstrate compliance has been approved by the Administrator as provided by §60.767(c)(2). EPA Method 3, 3A, or 3C shall be used to determine oxygen for correcting the NMOC concentration as hexane to 3 percent. In cases where the outlet concentration is less than 50 ppm NMOC as carbon (8 ppm NMOC as hexane), EPA Method 25A should be used in place of EPA Method 25. EPA Method 18 of Appendix A-6 of 40 CFR Part 60 may be used in conjunction with EPA Method 25A on a limited basis (compound specific, e.g., methane) or EPA Method 3C may be used to determine methane. The methane as carbon should be subtracted from the EPA Method 25A total hydrocarbon value as carbon to give NMOC concentration as carbon. The permittee shall divide the NMOC concentration as carbon by 6 to convert the CNMOC as carbon to CNMOC as hexane. Equation 4 shall be used to calculate efficiency:

$$\text{Control Efficiency} = (NMOC_{in} - NMOC_{out})/NMOC_{in}$$

where:

$NMOC_{in}$ = mass of NMOC entering control device; and

$NMOC_{out}$ = mass of NMOC exiting control device.

- d. During the emission testing, the EU shall be operated under operational conditions approved in advance by the OEPA NEDO. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up, or control equipment operational limitations. In general, testing shall be done under “worst-case” conditions expected during the life of the permit. As part of the information provided in the “Intent to Test” notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe “worst-case” operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the OEPA NEDO that the proposed operating conditions constitute “worst-case”. Failure to test under the approved conditions may result in OEPA not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the OEPA NEDO. The “Intent to Test” notification shall describe in detail the proposed test methods and procedures, the EU 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



Draft Permit-to-Install and Operate

West Point Renewables, LLC

Permit Number: P0129123

Facility ID: 0215000300

Effective Date: To be entered upon final issuance

approval prior to the test(s) may result in the OEPA NEDO's refusal to accept the results of the emission test(s).

- f. Personnel from the OEPA NEDO 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 EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the OEPA NEDO 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 OEPA NEDO.

- (3) See 40 CFR Part 60, Subpart XXX (40 CFR 60.760 - 60.769).

- (4) See 40 CFR Part 63, Subpart AAAA (40 CFR 63.1930 – 1990).

- g) Miscellaneous Requirements

- (1) None.