



State of Ohio Environmental Protection Agency

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12/31/2009

Certified Mail

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

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0641000223
Permit Number: P0103987
Permit Type: OAC Chapter 3745-31 Modification
County: Jefferson

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

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, Southeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.ohio.gov>.

Sincerely,

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

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

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

OhioEPA
Division of Air Pollution Control (DAPC)

Response to Comments

Project: Apex Sanitary Landfill, Chapter 31 modification of Division of Air Pollution Control Permits to Install: 06-06987, 06-07467 and 06-07264.

Ohio EPA ID #: Facility ID: 0641000223, Permit Number: P0103987

Agency Contacts for this Project

Division Contact: Steve Lowry, Division of Air Pollution Control, (740) 380 5231, steve.lowry@epa.state.oh.us

Public Involvement Coordinator: Jed Thorp, (614) 644 2160, jed.thorp@epa.state.oh.us

Ohio EPA held a public hearing on December 7, 2009 regarding Draft Air Permit for Apex Landfill. This document summarizes the questions received at the public hearing and during the associated comment period, which ended on December 14, 2009.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

Fugitive Dust Concerns

Comment 1: One person asked why better dust suppression cannot be required.

Response 1: The permit includes control measures to minimize the amount of particulate and visible emissions that can be emitted from the unpaved haul roads. If the control measures employed by the facility are deemed insufficient, Ohio EPA may require that additional control measures be implemented which could include the use of chemical suppressants/additives to help control dust.

Comment 2: One person asked why Ohio EPA cannot require that the facility unpaved roads be blacktopped.

Response 2: The permit includes control measures to minimize the amount of particulate and visible emissions that can be emitted from the unpaved haul roads. If the control measures employed by the facility are deemed insufficient, Ohio EPA may require that additional control measured be implemented which could include the paving of on-site roadways.

Comment 3: One person asked why Ohio EPA cannot require the facility trucks to go through a wheel wash unit prior to entering state roads.

Response 3: The permit includes control measures to minimize the deposition of mud or dust on public roads. If the control measures employed by the facility for the minimization of the deposition of mud or dust on public roads are deemed insufficient, Ohio EPA may require the facility to submit a plan for a wheel and undercarriage washing station for all vehicles leaving the facility.

Comment 4: **A commenter wrote to express his concerns regarding the fugitive dust originating from the landfill's haul roads and dust originating during the dumping of dry containerized waste.**

Response 4: As indicated in the draft air permit, the facility is obligated to employ control measures to ensure that the dust emanating from the facility roadways and other material handling operations are adequately controlled. In accordance with the draft air permit and the associated permit application, the facility will use water to control the dust emissions in a manner that will allow the applicable emission limitation and control measure requirements to be met.

Site Visits to Apex Landfill

Comment 5: **One person asked how many times has Ohio EPA has visited Apex Landfill since July 9, 2009.**

Response 5: Ohio EPA Southeast District Office Staff have made 14 site visits to the Apex landfill since July 9, 2009.

Comments from Apex Landfill

Comment 6: **Page 10, Paragraph 12 requires a Title V permit application or modification application to be submitted within 12 months after commencing operation of the emissions unit. A Title V permit application was submitted in November 2006. Does Ohio EPA expect that review of the 2006 application will be completed prior to the 12 month deadline (expected to be January 2011).**

Response 6: As part of the Title V permit renewal process, Apex will need to revise or renew their Title V permit application to address any facility or emissions unit changes that have occurred after November of 2006. The DAPC considers the review of the Apex Title V permit application to be a priority project. However, at this time we cannot anticipate when the final review of the application will be completed.

Comments from Apex Landfill regarding emissions unit F001

Comment 7: **Page 16, Paragraph b)(1)b. This paragraph states that "all" unpaved roadways. We suggest it be revised to state "roadways defined in b)(2)(a)."**

Response 7: Ohio EPA has revised page 16, Paragraph 2(b) to state "The permittee shall employ best available control measures on all unpaved roadways associated with this emissions unit, for the purpose of ensuring compliance with the above-mentioned applicable requirements."

Comments from Apex Landfill regarding emissions unit F002

- Comment 8.** Pages 20 and 21, Paragraph b)(1)a. The emission limitations may need to be revised based on the comments provided below.
- Response 8.** Revisions to the applicable paragraphs have been made. See comments 9 and 10 below.
- Comment 9.** Page 27, Paragraph f)(1)a. The fugitive particulate emissions limit is 66.0 tons per year (tons/year). The application calculated a limit of 29.8 tons/year. The compliance method states that all waste is assumed to be C&DD. This is a conservative assumption since most of the waste is MSW. However, the difference would not be expected to result in such a large difference. The equation on page 28 used to calculate fugitive PE is very different than the equations used in previous permits for Apex and other similar facilities. The equation may be incorrect. For example, the equation has a constant 52 tons per year even if all of the other inputs were zero.
- Response 9.** The equation used to calculate fugitive PE accounts for wind erosion, handling and placement of daily cover and the handling of solid waste. This equation has been applied to other similar facilities. In light of the comment, the equation was reevaluated. The evaluation revealed a slight error and the conservative fugitive particulate emission limitation has been changed to 71.1 tons per
- Comment 10.** Page 28, Paragraph f)(1)(b. The landfill capacity is reported as 11,467,573 Mg but the actual capacity is 11,443,528 Mg as shown on Exhibit B-1 of the application. The same correction is required in Section c, d, and e.
- Response 10.** The landfill capacity has been changed from 11,467,573 to 11,443,528 Mg.
- Comment 11.** Page 29, Paragraph f)(1)f. There is a typographic error referring to USEPA.
- Response 11.** The typographic error was corrected.
- Comment 12.** Page 30, Paragraph f)(2)b. A value of 0.125 lbs of CO/MM BTU is used in the equation to calculate CO emissions. In the application a value of 0.37 lbs of CO/MM BTU was used (from AP-42, Table 13.5-1). The value of 0.37 results in the calculated 55.98 lbs/hr.
- Response 12.** The value of 0.125 lb of carbon monoxide per MM Btu has been replaced with 0.37 lb of carbon monoxide per MM BTU.
- Comment 13.** Page 31, Paragraph f)(2)(c. A value of 0.040 lbs of NO_x/MM Btu is used in the equation to calculate NO_x emissions. Based on a manufacture's performance guarantee, we request the values be changed to 0.068 lbs of NO_x/MM BTU.
- Response 13.** The value of 0.040 lb of nitrogen oxide per MM Btu has been changed to 0.068 lb of nitrogen oxides per MM Btu.
- Comment 14.** Page 31, Paragraph f)(2)d. A gas generation volume of 5443 scfm is used in the equation for SO₂ emissions. The value in the application is 5,543 scfm. Also a value of 49.6 ppmv/1,000,000 MMscf/scf is used throughout this section. The value should be 46.9 ppmv/1,000,000 MMscf/scf based on AP-42. If the two values are corrected it results in an emission of 2.63 lbs/hr and 11.53 tons per year. Also,

the equation may be more clear if a multiplication symbol was inserted after the universal gas constant.

Response 14. The value of 5443 standard cubic feet per minute (scfm) was changed to 5543 scfm. The value of 49.6 ppmv/1,000,000 MM scf was changed to 46.9 ppmv/1,000,000 MMscf/scf.

Comment 15. **Page 32, Paragraph f)(2)e. A gas generation volume of 5,443 scfm is used in the equation for NMOC emissions. The value in the application is 5,543 scfm. This results in an emission of 0.90 lbs/hr or 3.93 tons per year.**

Response 15. The value of 5,443 scfm was changed to 5,543 scfm. The emission limits were changed from 0.88 lb/yr to 0.90 lb/yr and 3.86 tons/yr to 3.93 tons/yr.

Comment 16. **Page 33, Paragraph f)(2)f. A gas generation volume of 5,443 scfm is used in the equation for VOC emissions. The value in the application is 5,543 scfm. This results in an emission of 0.35 lbs/hr or 1.53 tons per year.**

Response 16. The value of 5,443 scfm was changed to 5,543 scfm. The emission limits were changed from 0.34 lb/yr to 0.35 lb/yr and 1.51 tons/yr to 1.53 tons/yr.

Comment 17. **Page 33, Paragraph f)(2)g. A gas generation volume of 5,443 scfm is used in the equation for HCL emissions. The value in the application is 5,543 scfm. This results in an emission of 1.34 lbs/hr or 5.88 tons per year. Also the equation may be more clear if a multiplication symbol was inserted after the universal gas constant.**

Response 17. The value of 5,443 scfm was changed to 5,543 scfm. The emission limits were changed from 0.34 lb/yr to 1.34 lb/yr and 1.51 tons/yr to 5.88 tons/yr.

Comment 18. **Page 34, Paragraph f)(2)g. The second paragraph should refer to HCL instead of sulfur.**

Response 18. The reference to HCL was changed to sulfur.

Comments from Apex Landfill regarding emissions unit F004

Comment 19. **Page 39, Paragraph b)(2)b. This paragraph states that “all” unpaved roadways. We suggest it be revised to state “roadways defined in b)(2)(a).”**

Response 19. Ohio EPA has revised page 39, Paragraph 2(b) to state “The _____ permittee shall employ best available control measures on _____ all unpaved roadways associated with this emissions unit, for _____ the purpose of ensuring compliance with the above-mentioned applicable requirements.”

Comment 20. **Page 39, Paragraph b)(2)g. This section states the Ohio EPA may require the installation of a wheel wash if control measures are not sufficient to prevent the deposit of mud and dust on public roads. The vehicles using this roadway haul between the rail unloading area and the working face and will not enter public roads. We request that this paragraph be deleted because it is not relevant to this source.**

Response 20. This paragraph has been deleted.

Air Quality Standards

Comment 21: **A commenter asked about revisions made to Ohio's ambient air quality standards. Reportedly, air monitoring sites may be set up, among other things, for complaint areas. What constitutes a complaint area?**

Response 21: Ohio EPA, Division of Air Pollution Control has established special study ambient monitoring systems. These systems have been established to acquire specific monitoring data that may not have been collected by existing ambient monitoring systems. The existing ambient monitoring systems have been established to access compliance with the National Ambient Air Quality Standards. While there is no definition of what constitutes a "complaint area", these special study monitoring systems have been sited when Ohio EPA (or other State or federal agencies such as the Ohio Department of Health or the Agency for Toxic Substances and Disease Registry, respectively) have enough evidence to believe that a health risk may exist for the citizens living in or near an area of concern.

Rail unloading operation

Comment 22: **Commenter believes that the rail car unloading operations (Emissions Unit F005) at the Apex Landfill should occur in a totally enclosed building as has been required for other railcar unloading operations in Ohio.**

Response 22: The commenter has correctly indicated that other railcar unloading operations in the State have been required to use an enclosed building to control the emissions generated from the railcar unloading activities. All of the previously issued permits referenced by the commenter established the use of the enclosed building pursuant to Ohio EPA's best available technology requirements under OAC rule 3745-31-05(A)(3) or as a voluntary restriction under OAC rule 3745-31-02(A)(2). However, since the time the permits referenced by the commenter were issued, the Ohio legislature has revised the laws and regulations governing the applicability of Ohio EPA's best available technology requirements. Based upon the information in the facility's permit application and the review and evaluation conducted by Ohio EPA, the potential particulate emissions from the rail car unloading operation will be less than 10 tons per year, which precludes Ohio EPA from establishing best available technology requirements for this operation.

The commenter has also asked Ohio EPA to consider requiring a totally enclosed building pursuant to the reasonably available control measure requirements under OAC rule 3745-17-08(B) given that this rule is applicable to fugitive dust operations in Jefferson County. Ohio EPA agrees that the rule is applicable, that the technology of constructing an enclosed building is feasible, and that the enclosed building can result in a lower calculated particulate emission rate for the operation. However, the definition of reasonably available control measures also requires Ohio EPA to consider the cost-effectiveness of a proposed control measure relative to other measures that have also been proposed. In addressing this comment, Ohio EPA asked the permittee for additional cost information for their originally proposed control approach (spraying/misting system), for a modified version of the proposed approach (spraying/misting system with a suppressant additive), and for an enclosed building. The additional information provided does demonstrate that the spraying/misting system, as proposed, is the most cost-effective approach which is reasonably available given the control technologies evaluated.

End of Response to Comments



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

FINAL

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

Facility ID: 0641000223
Permit Number: P0103987
Permit Type: OAC Chapter 3745-31 Modification
Issued: 12/31/2009
Effective: 12/31/2009



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

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

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install
Permit Number: P0103987
Facility ID: 0641000223

Authorization

Facility ID: 0641000223
Facility Description: Sanitary landfill.
Application Number(s): A0035925, A0036765, A0038637, A0038881, A0038884
Permit Number: P0103987
Permit Description: Chapter 31 modification of 06-06987, 06-07467, and 06-07264 to increase allowable emissions from unpaved roadways and parking areas, MSW landfill, and rail unloading based on an increase in the waste acceptance rate. This permit also establishes requirements for landfill gas collection and control.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$2,900.00
Issue Date: 12/31/2009
Effective Date: 12/31/2009

This document constitutes issuance to:

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

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0103987
 Permit Description: Chapter 31 modification of 06-06987, 06-07467, and 06-07264 to increase allowable emissions from unpaved roadways and parking areas, MSW landfill, and rail unloading based on an increase in the waste acceptance rate. This permit also establishes requirements for landfill gas collection and control.

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

Emissions Unit ID:	F001
Company Equipment ID:	Paved and Unpaved Roadways and Parking Areas
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F002
Company Equipment ID:	Refuse Disposal Activities
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F004
Company Equipment ID:	Rail Unloading Facility Unpaved Roadway
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	F005
Company Equipment ID:	Material Handling Operations (rail/truck unloading)
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: P0103987
Facility ID: 0641000223

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, Southeast District Office.



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

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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) 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, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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, Southeast 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.



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B. Facility-Wide Terms and Conditions



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1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under State law only:
 - a) None.
2. The following emissions unit contained in the permit is subject to 40 CFR Part 63 Subpart AAAA: F002, The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Southeast District Office.
3. The following emissions unit contained in the permit is subject to 40 CFR Part 60 Subpart WWW: F002, The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA Southeast District Office.



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C. Emissions Unit Terms and Conditions



1. F001, Unpaved Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Unpaved landfill roadways and parking areas leading from the landfill entrance to the active waste acceptance area with 120,196 maximum vehicle miles traveled (VMT)/year. This PTI is a Chapter 31 Modification of PTI 06-06987 issued on 12/10/2002 and is based on the increase in VMT.

- 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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions (PE) shall not exceed 31.6 tons per year. Emissions of fugitive particulate matter of 10 microns or less (PM10) shall not exceed 8.6 tons per year. There shall be no visible PE from unpaved roadways and parking areas except for a period of time not to exceed three minutes during any 60-minute observation period. The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see b)(2)b. through b(2)g.
b.	OAC rule 3745-17-07(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-08(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

Unpaved landfill roadways and parking areas leading from the landfill entrance to the active waste acceptance area.

- b. The permittee shall employ best available control measures on all unpaved roadways associated with this emissions unit, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to use a water truck to treat the unpaved roads with water to achieve compliance with this requirement. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or an unpaved roadway that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. 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 of no visible emissions except for one minute during any 60-minute period.
- e. 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.
- f. Open-bodied vehicles transporting materials likely to become airborne as fugitive dust shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- g. If control measures for the minimization of the deposit of mud or dust on public roads are insufficient to achieve compliance with applicable emission limitations and/or control requirements, Ohio EPA may require the permittee to submit to the Southeast District Office an approvable plan and schedule for the design, installation, maintenance, and operation of a wheel and undercarriage washing station that shall be used by all vehicles leaving the facility. The design shall include adequate onsite travel distance on well-maintained surfaces to allow the vehicles to properly "throw off" any excess water the truck wheels may hold to



eliminate the potential of causing water slicks, ice, etc. from forming on any public thoroughfares.

- h. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
- i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the BAT requirements of OAC rule 3745-31-05.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

<u>Unpaved Roadways and parking areas</u>	<u>Minimum Inspection Frequency</u>
all roads and parking areas	daily while in 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 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 and time of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

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



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) These 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 in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Fugitive PE shall not exceed 31.6 tons per year.
Applicable Compliance Method:
Compliance with the fugitive PE limitation shall be determined by using the emission factor equations in Section 13.2.2 in Compilation of Air Pollutant Emission Factors AP-42, Fifth Edition Volume 1 (revised 11/06) and inputs from the revised February 2009 PTI Application.
 - b. Emission Limitation:
Emissions of fugitive PM10 shall not exceed 8.6 tons per year.
Applicable Compliance Method:
Compliance with the fugitive PM10 limitation shall be determined by using the emission factor equations in Section 13.2.2 in Compilation of Air Pollutant Emission Factors AP-42, Fifth Edition Volume 1 (revised 11/06) and inputs from the revised February 2009 PTI Application.
 - c. Emission Limitation:
There shall be no visible PE from unpaved roadways and parking areas except for a period of time not to exceed three minutes during any 60-minute observation period.



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Applicable Compliance Method:

Compliance with the visible emission 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, 2002, 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. F002, Refuse Disposal Activities

Operations, Property and/or Equipment Description:

Municipal Solid Waste (MSW) Landfill refuse disposal activities including dumping, spreading, compacting, covering, and landfill flare. This PTI is a Chapter 31 modification of PTI 06-07467 issued on 10/28/2004 and is based on an increase in AMDWR to 7,500 tons per day.

- 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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Fugitive (non-stack) emissions shall not exceed the following:</p> <p>Non-methane organic (NMOC) emissions shall not exceed 44.5 tons per year.</p> <p>Methane (CH₄) emissions shall not exceed 6,962 tons per year.</p> <p>Volatile organic compounds (VOC) emissions shall not exceed 11.4 tons per year.</p> <p>Particulate Emissions (PE) shall not exceed 71.1 tons per year.</p> <p>Total hazardous air pollutants (HAP) shall not exceed 6.9 tons per year.</p> <p>Visible fugitive particulate emissions shall not exceed 20% opacity, as a three-minute average.</p> <p>The permittee shall employ best available control measures to minimize or eliminate visible particulate emissions of fugitive dust. See b)(2)a. through b)(2)e.</p> <p>The control device emission limitations for landfill gas shall not exceed the</p>



	Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
		<p>following:</p> <p>PM10 emissions shall not exceed 2.83 pounds per hour and 12.38 tons per year.</p> <p>Note: All particulate emissions from the control device are PM10.</p> <p>CO emissions shall not exceed 55.98 pounds per hour and 245.18 tons per year.</p> <p>NOx emissions shall not exceed 10.29 pounds per hour and 45.06 tons per year.</p> <p>SO2 emissions shall not exceed 2.63 pounds per hour and 11.53 tons per year.</p> <p>NMOC emissions shall not exceed 0.90 pound per hour and 3.93 tons per year.</p> <p>VOC emissions shall not exceed 0.35 pounds per hour and 1.53 tons per year.</p> <p>HCL emissions shall not exceed 1.34 pounds per hour and 5.88 tons per year.</p> <p>See b)(2)i through b)(2)j and b)(2)r</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subparts AAAA and A and 40 CFR Part 60, Subpart WWW.</p>
b.	<p>40 CFR Part 60, Subpart WWW (40 CFR Parts 60.750-759)</p> <p>[In accordance with 40 CFR Part 60.752 this emissions unit is an existing municipal solid waste landfill having a design capacity greater than 2.5 million Mg and a NMOC emission rate of greater than 50 Mg/yr, and is subject to the emissions limitations/control measures specified in this section.]</p>	<p>The permittee shall install a control system in accordance with 40 CFR Part 60.754(b)(2) that complies with 40 CFR Part 60.752(b)(2)(iii) (A) (<i>open flare</i>), (B) (<i>control system</i>) or (C) (<i>treatment system</i>).</p> <p>(<i>open flare</i>) Visible emissions from any open flare shall not exceed a total of 5 minutes during any 2 consecutive hours.</p> <p>The open flare shall be designed and operated in accordance with 40 CFR 60.18; or</p> <p>(<i>control system</i>) The control system shall be designed and operated to reduce</p>



	Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
		<p>NMOC by 98%, by weight; or, if the control is an enclosed combustion device, shall either reduce the NMOC by 98%, by weight or reduce the outlet NMOC concentration to less than 20 ppm by volume, on a dry basis as hexane at 3% oxygen.</p> <p>Visible emissions from the stack serving any control device other than an open flare shall not exceed 10% opacity as a six-minute average; or</p> <p><i>(treatment system)</i> The permittee shall route the collected gas to a treatment system that processes the collected gas for subsequent sale or use. All emissions from any atmospheric vent from the gas treatment system shall be subject to the requirements of 40 CFR Part 60.752(b)(2)(iii)(A) <i>(open flare)</i> or (B) <i>(control system)</i>.</p>
c.	40 CFR Parts 60.1-60.19	The permittee shall comply with all applicable requirements of the General Provisions found in 40 CFR Part 60, Subpart A.
d.	<p>40 CFR Part 63, Subpart AAAA (40 CFR Parts 63.1930-1990)</p> <p>[In accordance with 40 CFR Part 63.1935, this emissions unit is an existing solid municipal landfill with a design capacity greater than 2.5 million Mg and a NMOC emission rate of greater than 50 Mg/yr.</p>	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart WWW.
e.	40 CFR Part 63. 1-15 (63.1955(b))	Table 1 to Subpart AAAA of Part 63- Applicability of NESHAP General Provisions to Subpart AAAA shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
f.	OAC rule 3745-17-07(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
g.	OAC rule 3745-17-08(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The landfill fugitive dust operations/sources that are covered by this permit and subject to the requirements of OAC rule 3745-31-05 are listed below:
 - i. waste dumping/unloading;
 - ii. waste compaction;
 - iii. soil excavation and handling;
 - iv. covering of waste with soil;
 - v. wind erosion from landfill surfaces; and
- b. 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 has committed to watering the working face area to reduce emissions from the dumping of new dusty waste. Un-vegetated areas are to be kept as small as feasible and will be vegetated at the earliest convenience.
- c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary if there is snow and/or ice cover or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements (particulate emission limitations). Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. The above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the fugitive dust operation/sources until further observation confirms that use of the control measure(s) is unnecessary.



- e. The permittee shall ensure solid wastes are deposited, spread, and compacted in such a manner as to minimize or prevent visible emissions of fugitive dust. The permittee shall require all truckloads of solid waste to be unloaded in a manner which will minimize the drop height of the solid wastes. Any dusty materials or wastes likely to become airborne, shall be watered as necessary prior to or during dumping operations in order to minimize or eliminate visible emissions of fugitive dust, but any watering shall avoid free liquids and runoff. No dusty material shall be dumped during periods of high wind speed unless treated to prevent it from becoming airborne.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the BAT requirements of OAC rule 3745-31-05.
- g. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
- h. Deposition and burial operations of any suspected non-regulated asbestos-containing waste or demolition debris shall be conducted in a manner that prevents any asbestos content from being broken up or dispersed before such materials are buried.
- i. The facility cannot accept for disposal any regulated asbestos-containing material as defined in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos, 40 CFR Part 61, Subpart M, Section 141 and OAC Chapter 3745-20, or any subsequent revisions to either rule. Regulated asbestos-containing material is defined to include:
 - i. friable asbestos material;
 - ii. Category I nonfriable asbestos-containing material that has become friable;
 - iii. Category I nonfriable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading; or
 - iv. Category II nonfriable asbestos-containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.

The permittee shall be limited to accepting only non-regulated asbestos-containing waste materials. The permittee shall ensure that any Category I nonfriable asbestos-containing waste materials accepted for disposal will not be subjected to sanding, grinding, cutting, or abrading and shall not become friable during processing at the landfill; and shall ensure that Category II nonfriable asbestos-containing waste materials accepted for disposal do not become crumbled, pulverized, or reduced to powder by the forces expected to act on the material during its handling, transfer, and burial at the landfill. Any nonfriable



Category I or Category II asbestos-containing material that was generated from a NESHAP source and which becomes friable also becomes subject to the Asbestos NESHAP regulations. If any regulated asbestos-containing waste material arrives at the landfill it cannot be accepted for disposal; and if any non-regulated asbestos-containing material becomes friable after it is accepted for disposal the permittee shall:

- i. cause or permit no visible emissions to the outside air from the asbestos-containing waste materials during on-site transportation, transfer, deposition, or compacting operations;
 - ii. assure that deposition and burial operations are conducted in a manner which prevents handling by equipment or persons that causes asbestos-containing waste materials to be broken-up or dispersed before the materials are buried;
 - iii. cover the asbestos-containing waste material with at least 12 inches of non-asbestos-containing material, as soon as practicable after deposition, but no later than at the end of the operating day; and
 - iv. assure that during the unloading, deposition, burial and initial compaction of asbestos-containing waste materials, the disposal site is restricted adequately to deter unauthorized entry of the general public and any unauthorized personnel to within 100 feet of the operations.
- j. All terms stated in Additional Special Terms and Conditions Sections b)(2)h through b)(2)i. are defined as in 40 CFR 61.141 amended November 20, 1990 or any subsequent revisions.
- k. There shall be no open burning in violation of OAC Chapter 3745-19 at this facility.
- c) Operational Restrictions
- (1) See 40 CFR Part 60, Subpart WWW (40 CFR Parts 60.750-759)
 - (2) See 40 CFR Part 63, Subpart AAAA (40 CFR Parts 63.1930-1990)
 - (3) The permittee shall cover and compact asbestos wastes in accordance with the following requirements:
 - a. As soon as practical after the placement of asbestos, but no later than the end of each working day, the asbestos-containing waste materials deposited at the site during the operating day shall be covered with at least 12 inches of non-asbestos-containing materials. Once the asbestos-containing materials are covered, the area shall be compacted.
 - b. Care shall be taken to ensure that disposed asbestos shall not be re-excavated in subsequent operations. Any accidentally exposed



material shall be immediately recovered in accordance with the provisions of this permit.

- c. asbestos-containing waste materials shall be separated from the landfill final grade by no less than 24 inches of compacted non-asbestos-containing materials or by at least six inches of compacted non-asbestos-containing materials with a permanent cover of vegetation over the area, or in accordance with current requirements for closure, whichever is more stringent.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall keep for at least five years up-to-date, readily accessible, on-site records of the maximum design capacity, the current amount of solid waste in place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within four hours. Either paper or electronic formats are acceptable.

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

<u>landfill fugitive dust operations/sources</u>	<u>minimum inspection frequency</u>
a. waste dumping/unloading	once during each day of operation
b. waste compaction	once during each day of operation
c. soil excavation and handling	once during each day of operation
d. covering of waste with soil	once during each day of operation
e. wind erosion from landfill surfaces	once during each day of operation

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

- (4) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);



- c. the dates the control measure(s) was (were) implemented; and
- d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in Section d)(4) 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.

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

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; and
 - b. each instance when a control measure, that was to be performed 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.

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

f) Testing Requirements

- (1) Compliance with the fugitive emission limitations in Section b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation:

Fugitive PE shall not exceed 71.1 tons per year.

Applicable Compliance Method:

The permittee shall demonstrate compliance by use of the following equation, derived using standard AP-42 and U.S. EPA emission factors, and including emissions from wind erosion, daily cover material handling and placement, handling of waste (dumping waste), spreading, grading, and compaction of waste, this equation assumes all waste is construction



$$F_{002}(TPY) = (8.81 \times 10^{-4}) * (365 - p) * (f) * (acres) + (6.81 \times 10^{-5}) * (AMDWR) * \left(\frac{U}{5}\right)^{1.3} + (52.09)$$

Where:

p is the no. of day with more than 0.01 inch of precipitation (145)

f is the percent of time wind speed is greater than 12 mph (30)

acres is the maximum total exposed acreage at any time (assume working face never exceeds three acres)

AMDWR is the anticipated maximum daily waste receipt (7,500 tons/day municipal waste + 2,000 tons/day CD&D waste = 9,500 tons/day from application).

U is the mean wind speed (10.0 mph).

b. Emission Limitation:

Fugitive NMOC emissions shall not exceed 44.5 tons per year.

Applicable Compliance Method:

The permittee shall demonstrate compliance through calculations using the Landfill Gas Emissions Model (LandGEM) version 3.02 for a maximum landfill capacity of 11,443,528 Mg of compacted waste and AP-42 emission factors from Section 2.4, Municipal Solid Waste Landfills.

c. Emission Limitation:

Fugitive CH₄ emissions shall not exceed 6,962 tons per year.

Applicable Compliance Method:

The permittee shall demonstrate compliance through calculations using the LandGEM version 3.02 for a maximum landfill capacity of 11,443,528 Mg of compacted waste and AP-42 emission factors from Section 2.4, Municipal Solid Waste Landfills.

d. Emission Limitation:

Fugitive VOC emissions shall not exceed 11.4 tons per year.

Applicable Compliance Method:

The permittee shall demonstrate compliance through calculations using the LandGEM version 3.02 for a maximum landfill capacity of 11,443,528 Mg of compacted waste and AP-42 emission factors from Section 2.4, Municipal Solid Waste Landfills.

e. Emission Limitation:

Fugitive HAP emissions shall not exceed 6.9 tons per year.

Applicable Compliance Method:

The permittee shall demonstrate compliance through calculations using the LandGEM version 3.02 for a maximum landfill capacity of 11,443,528 Mg of compacted waste and AP-42 emission factors from Section 2.4, Municipal Solid Waste Landfills.

f. Emission Limitation:

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

Applicable Compliance Method:

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

(2) Compliance with the control device emission limitations in Section b)(1) shall be determined in accordance with the following methods:

a. Emission Limitations:

Control device PM₁₀ emissions shall not exceed 2.83 pounds per hour and 12.38 tons per year.

Applicable Compliance Methods:

Initial compliance with the above hourly emission limitation may be determined by multiplying the (maximum landfill gas generation rate of 5,543 dscfm) x (0.50 cubic ft methane/cubic ft of landfill gas) x (17 lbs of PM/1,000,000 dscf methane*) x (60 minutes/hour) = 2.83 lbs/hr.

*AP-42, Section 2.4, Municipal Solid Waste Landfills [11/98] (all PM is assumed to be PM₁₀).

Compliance with the hourly emission limitation shall be determined by multiplying the (maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in dscfm) x (0.50 cubic ft methane/cubic ft of landfill gas) x (17 lbs of PM/1,000,000 dscf methane*) x (60 minutes/hour) = result in lbs/hr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 201/202 of 40 CFR Part 60, Appendix A.

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton.



Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

b. Emission Limitations:

Control device CO emissions shall not exceed 55.98 pounds per hour and 245.18 tons per year.

Applicable Compliance Methods:

Initial compliance with the above hourly emission limitation has been determined by multiplying the (maximum landfill gas generation rate of 5,543 scfm) x (0.50 cubic ft methane/cubic ft of landfill gas) x (909.8 Btu/cubic ft of methane) x (0.37 lbs of CO/1,000,000 Btu*) x (60 minutes/hour) = 55.98 lbs/hr.

*This value has been established based upon a manufacturer's performance guarantee.

Compliance with the hourly emission limitation shall be determined by multiplying the (maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm) x (0.50 cubic ft methane/cubic ft of landfill gas) x (909.8 Btu/cubic ft of methane) x (emissions factor of control equipment or the most recent value determined by stack testing in lbs of CO/1,000,000 Btu) x (60 minutes/hour) = result in lbs/hr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

c. Emission Limitations:

Control device NOx emissions shall not exceed 10.29 pounds per hour and 45.06 tons per year.

Applicable Compliance Methods:

Initial compliance with the above hourly emission limitation has been determined by multiplying the (maximum landfill gas generation rate of 5,543 scfm) x (0.50 cubic ft methane/cubic ft of landfill gas) x (909.8 Btu/cubic ft of methane) x (0.068 lb of NOx/1,000,000 Btu*) x (60 minutes/hour) = 10.29 lbs/hr.

*This value has been established based upon a manufacturer's performance guarantee.



Compliance with the hourly emission limitation shall be determined by multiplying the (maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm) x (0.50 cubic ft methane/cubic ft of landfill gas) x (909.8 Btu/cubic ft of methane) x (emissions factor of control equipment or the most recent value determined by stack testing in lbs of NOx/1,000,000 Btu) x (60 minutes/hour) = result in lbs/hr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 7E of 40 CFR Part 60, Appendix A.

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

d. Emission Limitations:

Control device SO₂ emissions shall not exceed 2.63 pounds per hour and 11.53 tons per year.

Applicable Compliance Methods:

Initial compliance with the above hourly emission limitation shall be determined by using AP-42, Municipal Solid Waste Landfills [11/98] and the following equation:

$$((\text{the maximum landfill gas generation rate of } 5,543 \text{ scfm}) \times (46.9 \text{ *ppmv}/1,000,000 \text{ MMscf/scf})) \times (64.066 \text{ molecular weight of SO}_2) / (0.7302 \text{ universal gas constant} \times 520 \text{ Temp}) \times 60 \text{ min/hr} = 2.63 \text{ lbs/hr.}$$

*Sulfur concentration in the exhaust gas from AP-42 = 46.9 ppmv based upon 99.7% landfill gas control efficiency (represents worst-case emissions for SO₂).

Compliance with the hourly emission limitation shall be determined by the following equation:

$$((\text{maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm}) \times (46.9 \text{ *ppmv}/1,000,000 \text{ MMscf/scf})) \times (64.066 \text{ molecular weight of SO}_2) / (0.7302 \text{ universal gas constant} \times 520 \text{ Temp}) \times 60 \text{ min/hr} = \text{result in lbs/hr.}$$

*Sulfur concentration in the exhaust gas from AP-42 = 46.9 ppmv based upon 99.7% landfill gas control efficiency (represents worst-case emissions for SO₂).



If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

e. Emission Limitations:

Control device NMOC emissions shall not exceed 0.90 pound per hour and 3.93 tons per year.

Applicable Compliance Methods:

Initial compliance with the above hourly emission limitation may be determined by using AP-42, Municipal Solid Waste Landfills [11/98] and the following equation:

$$((\text{the maximum landfill gas generation rate of } 5,543 \text{ scfm}) \times (595 \text{ *ppmv}/1,000,000 \text{ MMscf/scf}) \times (86.18 \text{ molecular weight of NMOC \{as hexane\}})) / (0.7302 \text{ universal gas constant} \times 520 \text{ Temp})) \times (60 \text{ min/hr}) \times (1 - 0.98 \text{ control efficiency of the control device(s)}) = 0.90 \text{ lb/hr.}$$

*Default NMOC concentration in inlet gas from AP-42 = 595 ppmv.

Compliance with the hourly emission limitation shall be determined by the following equation:

$$((\text{the maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm}) \times (595 \text{ *ppmv}/1,000,000 \text{ MMscf/scf}) \times (86.18 \text{ molecular weight of NMOC \{as hexane\}})) / (0.7302 \text{ universal gas constant} \times 520 \text{ Temp})) \times (60 \text{ min/hr}) \times (1 - 0.98 \text{ control efficiency of the control device(s)}) = \text{result in lb/hr.}$$

*Default NMOC concentration in inlet gas from AP-42 = 595 ppmv.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 18 or 25/25C of 40 CFR Part 60, Appendix A.

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.



f. Emission Limitations:

Control device VOC emissions shall not exceed 0.35 pound per hour and 1.53 tons per year.

Applicable Compliance Methods:

Initial compliance with the above hourly emission limitation may be determined by using AP-42, Municipal Solid Waste Landfills [11/98] and the following equation:

$$((\text{the maximum landfill gas generation rate of } 5,543 \text{ scfm}) \times (595 \text{ *ppmv}/1,000,000 \text{ MMscf/scf} \times .39 \text{ percentage of VOC in landfill gas from AP-42}) \times (86.18 \text{ molecular weight of NMOC \{as hexane\}})/(0.7302 \text{ universal gas constant} \times '520 \text{ Temp})) \times (60 \text{ min/hr}) \times (1-0.98 \text{ control efficiency of the control device(s)}) = 0.35 \text{ lb/hr.}$$

*Default NMOC concentration in inlet gas from AP-42 = 595 ppmv.

Compliance with the hourly emission limitation shall be determined by the following equation:

$$((\text{the maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm}) \times (595 \text{ *ppmv}/1,000,000 \text{ MMscf/scf} \times .39 \text{ percentage of VOC in landfill gas from AP-42}) \times (86.18 \text{ molecular weight of NMOC \{as hexane\}})/(0.7302 \text{ universal gas constant} \times '520 \text{ Temp})) \times (60 \text{ min/hr}) \times (1-0.98 \text{ control efficiency of the control device(s)}) = \text{result in lb/hr.}$$

*Default NMOC concentration in inlet gas from AP-42 = 595 ppmv.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 18 or 25/25C of 40 CFR Part 60, Appendix A.

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

g. Emission Limitations:

Control device HCL emissions shall not exceed 1.34 pounds per hour and 5.88 tons per year.

Applicable Compliance Methods:

Initial compliance with the above hourly emission limitation shall be determined by using AP-42, Municipal Solid Waste Landfills [11/98] and the following equation:



((the maximum landfill gas generation rate of 5,543 scfm) x (42.0 *ppmv/1,000,000 MMscf/scf)) x (36.5 molecular weight of HCl)/(0.7302 universal gas constant* x 520 Temp) x 60 min/hr = 1.34 lbs/hr.

* HCL concentration in the exhaust gas from AP-42 = 42.0 ppmv based upon 99.7% landfill gas control efficiency (represents worst-case emissions for HCl).

Compliance with the hourly emission limitation shall be determined by the following equation:

((maximum volume of landfill gas combusted by the control device(s) as demonstrated by recordkeeping, in scfm) x (42.0 *ppmv/1,000,000 MMscf/scf)) x (36.5 molecular weight of HCl)/(0.7302 universal gas constant* x 520 Temp) x 60 min/hr = result in lbs/hr.

*HCl concentration in the exhaust gas from AP-42 = 42.0 ppmv based upon 99.7% landfill gas control efficiency (represents worst-case emissions for HCl).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 26 or 26A of 40 CFR Part 60, Appendix A.

The initial annual emission limitation was established by multiplying the hourly emission limitation by 8,760 hours/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation will be satisfied.

- (3) Compliance with the emission limitation in 40 CFR Part 60, Subpart WWW (40 CFR Parts 60.750-759) specified in Section b)(1) shall be determined in accordance with the following methods:

- a. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance 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)(c) of OAC rule 3745-17-03. See f)(4) below.



b. Emission Limitation:

Should the permittee install a control system that complies with 40 CFR Part 60.752(b)(2)(iii), (B) (*control system*), visible emissions from the stack serving any control device other than an open flare shall not exceed 10% opacity as a six-minute average. See f)(4) below.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1). See f)(4) below.

c. Emission Limitation:

The control system shall be designed and operated to reduce NMOC by 98% by weight; or, if the control is an enclosed combustion device, shall either reduce the NMOC by 98% by weight or reduce the outlet NMOC concentration to less than 20 ppm, by volume, on a dry basis as hexane at 3% oxygen.

Applicable Compliance Method:

If required, Method 25, 25C, or Method 18 of appendix A of 40 CFR Part 60 must be used to determine compliance unless another method to demonstrate compliance has been approved by the Administrator as provided by 40 CFR Part 60.752(b)(2)(i)(B). Method 3 or 3A shall be used to determine oxygen for correcting the NMOC concentration as hexane to 3%. See f)(4) below.

d. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance 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)(c) of OAC rule 3745-17-03; or

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A,



Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
See f)(4) below.

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



- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).
- g. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

- (1) None.



3. F004, Rail Unloading Facility Unpaved Roadway

Operations, Property and/or Equipment Description:

Rail unloading facility unpaved roadways and parking areas leading from the unloading facility to the active waste disposal area, with a 381,288 maximum vehicle miles traveled (VMT)/year. This PTI is a Chapter 31 modification of PTI 06-07264 issued on 01/15/2004 and is based on the increase in VMT.

- 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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Fugitive particulate emissions (PE) shall not exceed 131.50 tons per year. Emissions of fugitive PM10 shall not exceed 35.50 tons per year. There shall be no visible PE from unpaved roadways and parking areas except for a period of time not to exceed three minutes during any 60-minute observation period. The permittee shall implement best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see b)(2)b. through b)(2)g.
b.	OAC rule 3745-17-07(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-08 (B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The unpaved roadways that are covered by this permit and subject to the above-mentioned requirements are listed below:

The unpaved roadways and parking areas leading from the rail unloading area to the active waste acceptance area.

- b. The permittee shall employ best available control measures on all unpaved roadways associated with the emission unit, for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to use a water truck to treat the unpaved roads with water to achieve compliance with this requirement. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or an unpaved roadway that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. 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 of no visible emissions except for one minute during any 60-minute period.
- e. 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.
- f. Open-bodied vehicles transporting materials likely to become airborne as fugitive dust shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- g. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
- h. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

<u>Unpaved Roadways and parking areas</u>	<u>Minimum Inspection Frequency</u>
all roads and parking areas	daily while in 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 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 and time of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

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

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



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

Operations, Property and/or Equipment Description:

Rail unloading and truck loading material handling. This PTI is a Chapter 31 Modification of PTI 06-07264 issued on 01/15/2004 and is based on the increase AMDWR.

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 Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Fugitive particulate emissions (PE) shall not exceed 5.7 tons per year. Emissions of fugitive particulate matter less than 10 microns in diameter (PM10) shall not exceed 2.7 tons per year. See b)(2)a. below.
b.	OAC rule 3745-17-07(B)(1)	Visible PE from any fugitive dust source shall not exceed 20% opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures to minimize or eliminate visible particulate emissions of fugitive dust. See b)(2)b through b)(2)e below.

(2) Additional Terms and Conditions

a. PTI P0103987 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3):

i. Material throughput restriction of 2,000 tons/day (730,000 tons/year).



- b. The material handling operations that are covered by this permit and are subject to the requirements of OAC rule 3745-17-08(B) are:
 - i. Material unloading from railcars; and
 - ii. Material loading into trucks.
- c. The permittee shall employ reasonably available control measures on all material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to use a spraying/misting system (i.e., the primary spray bar system or the portable misting units, as needed depending on weather conditions) to control any visible emissions which may occur from the material handling.
- d. The above control measures shall be employed for each material handling operation in the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- e. The permittee shall ensure that the unloading of materials from the railcars and the loading of materials into trucks shall be done in a manner that will minimize the drop height of the materials.
- f. The air contaminants emitted by this emissions unit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

<u>landfill fugitive dust operations/sources</u>	<u>minimum inspection frequency</u>
a. material unloading from railcars	once during each day of operation
b. material loading into trucks	once during each day of operation

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for particulate emissions. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a landfill fugitive dust operation/source that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not



performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next inspection is within one week.

- (3) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in Section d)(3)d. 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.

- (4) The permittee shall maintain monthly records of the amount of materials transferred in tons.

e) Reporting Requirements

- (1) If the daily (2,000) or yearly (730,000) tonnage of materials transferred exceeds the voluntary limits, specified in b)(2)a., the permittee shall notify the Ohio EPA, Southeast District Office within 30 days of the exceedance.
- (2) 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.
- (3) The reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations specified in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:

Fugitive PE shall not exceed 5.7 tons per year.

- a. Applicable Compliance Method:



Compliance with the fugitive PE limitations shall be determined by using the emission factor equations in Section 13.2.4 in Compilation of Air Pollutant Emission Factors AP-42, Fifth Edition Volume 1 (revised 11/06) and inputs from the revised February 2009 PTI Application.

Ongoing compliance with the annual emission limitation shall be assumed provided that compliance is demonstrated with the annual throughput limitation of 730,000 tons per year.

b. Emission Limitation:

Fugitive PE shall not exceed 2.7 tons per year.

Applicable Compliance Method:

Compliance with the fugitive PE limitations shall be determined by using the emission factor equations in Section 13.2.4 in Compilation of Air Pollutant Emission Factors AP-42, Fifth Edition Volume 1 (revised 11/06) and inputs from the revised February 2009 PTI Application.

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

- (1) None.