



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.ohio.gov

MAILING ADDRESS:

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

1/6/2010

Certified Mail

Robin Jones
ELDA Recycling and Disposal Facility
ELDA Gas Recovery
5751 Center Hill Avenue
Cincinnati, OH 45232

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431073124
Permit Number: P0098717
Permit Type: Renewal
County: Hamilton

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very 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.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.ohio.gov/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO 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

If you have any questions regarding this permit, please contact the Hamilton County Dept. of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.ohio.gov/dapc.

Sincerely,

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

Cc: HCDOES



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

FINAL

**Air Pollution Permit-to-Install and Operate
for
ELDA Recycling and Disposal Facility**

Facility ID: 1431073124
Permit Number: P0098717
Permit Type: Renewal
Issued: 1/6/2010
Effective: 1/6/2010
Expiration: 1/6/2020



Air Pollution Permit-to-Install and Operate
for
ELDA Recycling and Disposal Facility

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Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0098717
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Authorization

Facility ID: 1431073124
Application Number(s): A0030389
Permit Number: P0098717
Permit Description: Closed Municipal Solid Waste Landfill
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/6/2010
Effective Date: 1/6/2010
Expiration Date: 1/6/2020
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

ELDA Recycling and Disposal Facility
ELDA Gas Recovery
5751 Center Hill Avenue
Cincinnati, OH 45232

of a Permit-to-Install and Operate 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:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0098717

Facility ID: 1431073124

Effective Date: 1/6/2010

Authorization (continued)

Permit Number: P0098717

Permit Description: Closed Municipal Solid Waste Landfill

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

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



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Division of Air Pollution Control

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Permit Number: P0098717

Facility ID: 1431073124

Effective Date: 1/6/2010

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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



State of Ohio Environmental Protection Agency
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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0098717

Facility ID: 1431073124

Effective Date: 1/6/2010

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

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C. Emissions Unit Terms and Conditions



1. F002, MSW Landfill

Operations, Property and/or Equipment Description:

Landfill operation

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Enclosed flare emissions shall not exceed the following:</p> <p>Particulate emissions (PE) shall not exceed 0.17 pound per hour and 0.74 ton per year.</p> <p>Particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.17 pound per hour and 0.74 ton per year.</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 1.98 pounds per hour and 8.67 tons per year.</p> <p>Nitrogen oxides (NOx) emissions shall not exceed 4.81 pounds per hour and 21.1 tons per year.</p> <p>Carbon monoxide (CO) emissions shall not exceed 10.6 pounds per hour and</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>46.43 tons per year.</p> <p>Non-Methane Organic Compound (NMOC) emissions shall not exceed 0.86 pound per hour and 3.77 tons per year.</p> <p>Hydrochloric Acid (HCl) emissions shall not exceed 1.45 pounds per hour and 6.35 tons per year.</p> <p>See b)(2)a., b)(2)b. and b)(2)c.</p> <p>See c)(1) and c)(2).</p>
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	40 CFR Part 61, Subpart M and OAC rule 3745-20-07	See b)(2)d. and b)(2)e.
d.	OAC rule 3745-76	See g)(1).
e.	Director's Letter issued 05/12/08	<p>Backup flare emissions shall not exceed the following:</p> <p>Sulfur Dioxide (SO₂) emissions shall not exceed 0.84 pound per hour.</p> <p>Nitrogen Oxide Emissions (NO_x) shall not exceed 3.33 pounds per hour.</p> <p>Non-Methane Organic Compound (NMOC) emissions shall not exceed 0.13 pound per hour.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 18.14 pounds per hour.</p> <p>Particulate Emissions 10 microns and less in diameter (PM₁₀) and Particulate Emissions 2.5 microns and less in diameter (PM_{2.5}) shall not exceed 0.92 pound per hour.</p>

(2) Additional Terms and Conditions

- a. When not being sent to a third party end user, all landfill gas collected shall be routed to the control system (enclosed smokeless flare or backup open flare) designed and operated, within the parameter ranges demonstrated in the initial performance test or the most recent performance test that demonstrated



compliance, to reduce NMOCs by 98 weight-percent or to reduce outlet NMOC concentration to 20 ppm (as hexane) by volume at three percent oxygen, or less.

- b. The equipment that constitutes the gas collection and control system shall be properly maintained and kept in good operating condition at all times. The equipment shall be operated and maintained by personnel properly trained in its operation.
- c. The hourly emission limitations outlined in b)(1)a. and b)(1)e. are based on the emission unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- d. The permittee shall comply with one of the following requirements for this inactive waste disposal site containing asbestos:
 - i. discharge no visible emissions from the inactive waste disposal site; or
 - ii. cover the asbestos-containing waste material with at least six inches of compacted nonasbestos-containing material, and grow and maintain a cover of vegetation on the area adequate to prevent exposure of the asbestos-containing waste material; or
 - iii. cover the asbestos-containing waste material with at least two feet of compacted nonasbestos-containing material, and maintain the cover to prevent exposure of the asbestos-containing waste material.
- e. Unless a natural barrier adequately deters access by the general public to the inactive asbestos waste disposal site, the permittee shall install and maintain warning signs and fencing, in accordance with OAC rule 3745-20-07(B) or comply with OAC rule 3745-20-07(A)(2) or (A)(3) of this rule.
- f. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a gas collection system with an enclosed flare.
- g. This facility shall not cause or allow any open burning at this location.
- h. The owner or operator of this facility shall not install any air contaminant source other than those named in this Permit to Operate, including a landfill gas fired boiler, or generator, without first obtaining a Permit to Install from the Ohio EPA.
- i. There are no storage piles at this facility and this permit does not authorize the permittee to establish and maintain storage piles at this facility. Furthermore, access roads, used for the purpose of post closure care of the gas collection and control system, leachate management, etc. are the only permissible roadways at this facility.
- j. All recording devices shall be synchronized based on the time of day.

c) Operational Restrictions

- (1) Whenever the enclosed flare is in operation, the permittee shall maintain a temperature in accordance with either a. or b. of the following:



- a. at least 1400 degrees Fahrenheit;
 - b. at least the temperature established during the most recent compliance test which demonstrated compliance with the NMOC limits.
- (2) In the event of a potential emergency that results in the shutdown of any wells, the Hamilton County Department of Environmental Services shall be notified within 1 working day of the shutdowns of any such wells.
- (3) No additional wastes may be placed into the landfill without filing a notification of modification as described in 40 CFR Part 60.7(a)(4).
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the enclosed flare when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. Recording devices shall be synchronized based on the time of day.

The permittee shall collect and record the following information for each day:

- a. all 3-hour blocks of time during which the average combustion temperature within the enclosed flare, when the emissions unit was in operation, was
 - i. less than 1400 degrees Fahrenheit, or
 - ii. less than the temperature established during the most recent compliance test which demonstrated compliance with the NMOC limits.
 - b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
- (2) The permittee shall maintain monthly records of the total emissions, in tons, for NO_x, PE/PM₁₀, CO, SO₂, NMOC, and HCl in order to monitor compliance with the annual emission limitations.
- (3) The permittee shall maintain records of the location, depth and area, and quantity in cubic yards of all asbestos-containing waste materials within the disposal site, on a map or diagram of the disposal area.
- (4) The permittee shall record the daily gas volume combusted by each flare.
- (5) The permittee shall maintain a sampling port at each well.
- (6) The permittee shall measure and record the gauge pressure in the gas collection header on a monthly basis.



e) Reporting Requirements

- (1) The permittee shall submit semi-annual temperature deviation reports to the Hamilton County Department of Environmental Services which identify all 3-hour blocks of time during which the average enclosed flare temperature is less than 1400 degrees Fahrenheit (or the temperature during the most recent compliance test which demonstrated compliance with the NMOC limits). This report shall contain, at a minimum, the date, time of occurrence, cause, explanation, and corrective actions taken for any times when the temperature falls below the limit established during the initial performance test. If no deviation has occurred, the permittee shall submit a statement to that effect. Reports shall be submitted by January 31 and July 31 of each year and shall address the data obtained during the previous semi-annual period (July through December and January through June, respectively).
- (2) The permittee shall submit annual reports that specify the total PE/PM10, SO2, NOx, CO, NMOC, and HCl emissions from this emissions unit for the previous calendar year to the Hamilton County Department of Environmental Services. These reports shall be submitted by January 31st of each year.
- (3) The permittee shall notify the appropriate Ohio EPA District Office or local air agency in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided at least 10 working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. The following information shall be included in the notice:
 - a. Scheduled starting and completion dates.
 - b. Reason for disturbing the waste.
 - c. Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. (If deemed necessary, the Director may require changes in the proposed emission control procedures).
 - d. Location of any temporary storage site and the final disposal site.
- (4) The permittee shall notify the Hamilton County Department of Environmental Services no later than 30 days prior to removing or permanently discontinuing the operation of the flare or the active gas collection and control system.
- (5) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

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

a. Emission Limitation:

NOx emissions shall not exceed 4.81 lbs/hr.

Applicable Compliance Method:

To determine the hourly NOx emissions, multiply the actual landfill gas flow rate (ft³/minute) by the measured methane percentage (%); multiplied by the lower heating value of methane (909 Btu/ft³); multiplied by MMBtu/1,000,000 Btu; multiplied by 60 minutes/hour; multiplied by the NOx emission factor of 0.06 lbs of NOx/MMBtu.

b. Emission Limitation:

NOx emissions shall not exceed 21.1 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable NOx emission limitation (4.81 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

SO2 emissions shall not exceed 1.98 lbs/hr.

Applicable Compliance Method:

To determine the hourly SO2 emissions, multiply the actual landfill gas flow rate (ft³/minute) by the measured methane percentage (%); multiplied by the lower heating value of methane (909 Btu/ft³); multiplied by MMBtu/1,000,000 Btu; multiplied by 60 minutes/hour; multiplied by the SO2 emission factor of 0.035 lbs of SO2/MMBtu.

d. Emission Limitation:

SO2 emissions shall not exceed 8.67 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable SO2 emission limitation (1.98 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.



e. Emission Limitation:

CO emissions shall not exceed 10.6 lbs/hr.

Applicable Compliance Method:

To determine the hourly CO emissions, multiply the actual landfill gas flow rate (ft³/minute) by the measured methane percentage (%); multiplied by the lower heating value of methane (909 Btu/ft³); multiplied by MMBtu/1,000,000 Btu; multiplied by 60 minutes/hour; multiplied by the CO emission factor of 0.2 lbs of CO/MMBtu.

f. Emission Limitation:

CO emissions shall not exceed 46.43 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable CO emission limitation (10.6 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

NMOC emissions shall not exceed 0.86 lbs/hr.

Applicable Compliance Method:

To determine the hourly NMOC emissions, multiply 268 ppm NMOC/1,000,000 by 86 (the molecular weight hexane)/385.4 scf/lb-mole; multiplied by the actual landfill gas flow rate (scf/hour); multiplied by the control efficiency of (1-0.98).

h. Emission Limitation:

NMOC emissions shall not exceed 3.77 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable VOC emission limitation (0.86 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

i. Emission Limitation:

PE/PM10 shall not exceed 0.17 lb/hr.

Applicable Compliance Method:



To determine the hourly PE/PM₁₀ emissions, multiply the actual landfill gas flow rate (ft³/minute) by the measured methane percentage (%); multiplied by the lower heating value of methane (909 Btu/ft³); multiplied by MMBtu/1,000,000 Btu; multiplied by 60 minutes/hour; multiplied by the PE/PM₁₀ emission factor of 0.003 lbs of PE/PM₁₀/MMBtu.

j. Emission Limitation:

PE/PM₁₀ shall not exceed 0.74 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.17 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

k. Emission Limitation:

HCl emissions shall not exceed 1.45 lbs/hr.

Applicable Compliance Method:

To determine the hourly HCl emissions, multiply the maximum fuel usage of 0.1209 MMSCF/hr by the facility supplied emission factor of 12 lbs of HCl/MMSCF.

l. Emission Limitation:

HCl emissions shall not exceed 6.35 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable HCl emission limitation (1.45 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

m. Visible Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0098717

Facility ID: 1431073124

Effective Date: 1/6/2010

g) Miscellaneous Requirements

- (1) The control requirements of OAC rule 3745-76 no longer apply to this facility pursuant to OAC rule 3745-76-07(B)(2)(e).