11/2/2010

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Mr. Billy Huston
Clean Water Ltd.
300 Cherokee Drive
Dayton, OH 45427

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0857751312
Permit Number: P0105924
Permit Type: Administrative Modification
County: Montgomery

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 pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission 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 Regional Air Pollution Control Agency. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
RAPCA; Indiana; Kentucky

Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	0857751312
Facility Name:	Clean Water Ltd.
Facility Description:	off site waste and recovery operations
Facility Address:	300 Cherokee Drive Dayton, OH 45427 Montgomery County
Permit #:	P0105924, Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Dayton Daily News on 09/09/2010. The comment period ended on 10/09/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. 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. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Request for clarification in terms.

   a. Comment: Concern was expressed over the enforceability of the plant wide annual VOC emissions limitation contained in the permit, and the statement was made that failure to include a practical method of verifying annual emissions in this permit may invite future disputes about compliance with this limitation.

   b. Response: Term B.16. of the Facility-Wide Terms and Conditions specifies the methods for determining compliance with the plant wide emissions limitation. In the past there has been disagreement on the level of emissions from the facility. Stack testing has been conducted at the facility that provided information which better established the level of actual emissions generated from those sources controlled by the closed-vent system and regenerative thermal oxidizer (RTO) control system. Based on the data from the stack testing and using the compliance methods specified in the permit, the VOC emissions generated from those sources controlled by the RTO account for approximately 98% of the total emissions generated by the facility. We believe the methods for determining compliance specified in the permit provide a clear, reasonable and practical way of verifying compliance with the annual emissions limitation.

2. Topic: Reference to location for pressure monitors for closed-vent system.

   a. Comment: Permit condition 3(d) (5) relates to the closed-vent system requiring maintenance of negative pressure in the closed-vent system. All parties believe that additional negative pressure monitoring beyond the single recorded negative pressure monitor near the thermal oxidizer is necessary to confirm that negative pressure is maintained over the large and complex system. There are five such monitors in place which are not connected to the data acquisition system and included in the stack test at the facility.

   Condition 3(d) (5) purports to require that these monitors be viewed each day and the readings manually logged. According to 3(d) (5) the monitors are described in c) (4). Unfortunately, c (4) does not include specific language regarding these locations or this requirement. Language which specifically identifies these monitors should be added.

   b. Response: Consistent with the requirement of the Consent Decree referenced in terms 3.c)(4) and 5.c)(4) of the permit, the pressure in the closed-vent system was measured during compliance performance testing at documented locations which demonstrated negative pressure was maintained in the entire system. The facility is required to monitor the pressure at these locations to assure negative pressure is maintained throughout the entire closed-vent system and to comply with the Consent Decree requirement. Language was added to terms 3.c)(4) and 5.c)(4) that specifies that pressure monitoring locations shall include those which were monitored during the most recent performance stack test that demonstrated that negative pressure was maintained in the entire closed-vent system.

Ohio Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Clean Water Ltd.

Facility ID: 0857751312
Permit Number: P0105924
Permit Type: Administrative Modification
Issued: 11/2/2010
Effective: 11/2/2010

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Clean Water Ltd.

Table of Contents

Authorization

Facility ID: 0857751312
Facility Description: off site waste and recovery operations
Application Number(s): M0000702
Permit Number: P0105924
Permit Description: Administrative modification to PTI 08-04938 to update and clarify monitoring, record keeping, and reporting requirements; add rolling 12-month OC emissions limitation; and to make corrections.
Permit Type: Administrative Modification
Permit Fee: $0.00
Issue Date: 11/2/2010
Effective Date: 11/2/2010

This document constitutes issuance to:

Clean Water Ltd.
300 Cherokee Drive
Dayton, OH 45427

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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: P0105924
Permit Description: Administrative modification to PTI 08-04938 to update and clarify monitoring, record keeping, and reporting requirements; add rolling 12-month OC emissions limitation; and to make corrections.

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

Group Name: Containers, Level 1

Emissions Unit ID:	**P029**
Company Equipment ID:	Containers <0.46m3
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable

Group Name: Containers,Level 2

Emissions Unit ID:	**P030**
Company Equipment ID:	Drum-006
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P031**
Company Equipment ID:	Drum-005
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P032**
Company Equipment ID:	Tote-203
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P033**
Company Equipment ID:	Tote-205
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P034**
Company Equipment ID:	Containers >0.46m3
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P035**
Company Equipment ID:	Haz Tanker Trucks
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P036**
Company Equipment ID:	T-807
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P037**
Company Equipment ID:	Drum-007
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P038**
Company Equipment ID:	Bldg B WWT Roll-off
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable

Group Name: Oil/Water Separators

Emissions Unit ID:	**P002**
Company Equipment ID:	T-402
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	Tricanter
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	Centrifuge 1
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	Centrifuge 3
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	Sweco-01
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	Sweco-02
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable

Group Name: Tanks, Level 1

Emissions Unit ID:	**T044**
Company Equipment ID:	S-71
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T045**
Company Equipment ID:	T-706B
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T046**
Company Equipment ID:	S-1
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T047**
Company Equipment ID:	S-2
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T048**
Company Equipment ID:	S-3
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T049**
Company Equipment ID:	S-4
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T050**
Company Equipment ID:	S-6
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T051**

Company Equipment ID:	S-7
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T052**
Company Equipment ID:	S-13
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T053**
Company Equipment ID:	S-14
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T054**
Company Equipment ID:	S-21
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T055**
Company Equipment ID:	S-22
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T056**
Company Equipment ID:	S-23
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T057**
Company Equipment ID:	S-24
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T058**
Company Equipment ID:	S-28
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T059**
Company Equipment ID:	W-4
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T060**
Company Equipment ID:	T-609A
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T061**
Company Equipment ID:	T-609B
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T062**
Company Equipment ID:	T-609C
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable

Group Name: Tanks, Level 2

Emissions Unit ID:	**T063**
Company Equipment ID:	OR-1
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T064**
Company Equipment ID:	T-002
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	**T065**
Company Equipment ID:	T-001
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T066**
Company Equipment ID:	OR-2
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T067**
Company Equipment ID:	T-206
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T068**
Company Equipment ID:	T-1
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T069**
Company Equipment ID:	T-2
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T070**
Company Equipment ID:	TW-1
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T071**
Company Equipment ID:	TW-1a
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T072**
Company Equipment ID:	T-602
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T073**
Company Equipment ID:	T-603
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T074**
Company Equipment ID:	Lamella
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T075**
Company Equipment ID:	G-1
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T076**
Company Equipment ID:	G-2
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T077**
Company Equipment ID:	G-3
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T078**
Company Equipment ID:	T-808
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T079**

Company Equipment ID:	B-1
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T080**
Company Equipment ID:	B-2
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T081**
Company Equipment ID:	B-3
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T082**
Company Equipment ID:	B-4
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T083**
Company Equipment ID:	C-2
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T084**
Company Equipment ID:	C-3
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T085**
Company Equipment ID:	C-4
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T086**
Company Equipment ID:	P-1
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T087**
Company Equipment ID:	P-2
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T088**
Company Equipment ID:	R-1
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T089**
Company Equipment ID:	R-2
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T090**
Company Equipment ID:	S-9
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T091**
Company Equipment ID:	S-10
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T092**
Company Equipment ID:	S-11
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T093**
Company Equipment ID:	S-12

Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T094**
Company Equipment ID:	S-25
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T095**
Company Equipment ID:	S-26
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T096**
Company Equipment ID:	S-27
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T097**
Company Equipment ID:	W-1
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T098**
Company Equipment ID:	W-2
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T099**
Company Equipment ID:	W-5
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T100**
Company Equipment ID:	W-6
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T101**
Company Equipment ID:	T-006
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T102**
Company Equipment ID:	T-003
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T103**
Company Equipment ID:	T-004
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T104**
Company Equipment ID:	T-005
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T105**
Company Equipment ID:	T-007
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T106**
Company Equipment ID:	SBR
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**T107**
Company Equipment ID:	VDR
Superseded Permit Number:	08-04938

General Permit Category and Type:	Not Applicable

Group Name: Transfer Systems

Emissions Unit ID:	**P010**
Company Equipment ID:	Bldg B WW Transfer
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P011**
Company Equipment ID:	Bldg B WW Ind. Drain
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P012**
Company Equipment ID:	Bldg B Oil Transfer
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P013**
Company Equipment ID:	Condenser Transfer
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P014**
Company Equipment ID:	Haz Fuel Transfer
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P015**
Company Equipment ID:	S-71 Transfer
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P016**
Company Equipment ID:	Bldg G WW Drain
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P018**
Company Equipment ID:	Bldg B G3 Transfer
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P019**
Company Equipment ID:	Bio WW Transfer
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P020**
Company Equipment ID:	Bio WW Drain
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P021**
Company Equipment ID:	Transfer Pad A WW
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P022**
Company Equipment ID:	Transfer Pad A Oil
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P025**
Company Equipment ID:	Transfer Pad B Bulk
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P026**
Company Equipment ID:	Transfer Pad C

Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P027**
Company Equipment ID:	Transfer Pad D
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P028**
Company Equipment ID:	Transfer Pad E
Superseded Permit Number:	08-04938
General Permit Category and Type:	Not Applicable

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 of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA 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 Regional Air Pollution Control Agency.

(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 Regional Air Pollution Control Agency. 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 Regional Air Pollution Control Agency 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 Regional Air Pollution Control Agency 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 Regional Air Pollution Control Agency 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 Regional Air Pollution Control Agency.

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 Regional Air Pollution Control Agency. 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 by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown 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 reporting requirements identified in this permit 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 deviation report, 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 new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

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.

B. Facility-Wide Terms and Conditions

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 emissions units contained in this permit are subject to MACT 40 CFR Part 63, Subpart DD, National Emissions Standards for Hazardous Air Pollutants (HAP) from Off-Site Waste and Recovery Operations. The complete MACT requirements will be established in the Title V permit for this facility which will encompass theses emissions units upon issuance.

   The permittee shall comply with the applicable provisions of the MACT as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DD. Various standards and compliance requirements of 40 CFR Part 63, Subpart DD are applicable to not only permitted emissions units but also their auxiliary components that affect air emissions. In addition, Subpart DD cross-references the following other subparts in Part 63 for the air emissions control requirements to be applied to specific types of affected sources.

   Subpart OO National Emission Standards for Tanks - Level 1

   Subpart PP National Emission Standards for Containers

   Subpart QQ National Emission Standards for Surface Impoundments

   Subpart RR National Emission Standards for Individual Drain Systems

   Subpart VV National Emission Standards for Oil-Water Separators and Organic-Water Separators

   The permittee currently has no emissions units or sources of emissions subject to Subpart QQ National Emission Standards for Surface Impoundments.

3. All the emissions units contained in this permit are subject to BAT requirements of OAC rule 3745-31-05(A)(3) and the limitations of OAC rule 3745-21-07(G). OAC rule 3745-21-07(G) is less stringent than the requirements of MACT Subpart DD.

4. The following tank emissions units are potentially subject to the NSPS 40 CFR Part 60, Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984: T045, T052, T060, T061, and T062 listed in the Emissions Unit Group named Tanks, Level 1; and T063, T066, T079, T081, T082, T088, T089, T090, T091, T092, T093, T096, T097, T099, T100, T106, and T107 listed in the Emissions Unit Group named Tanks, Level 2.

5. All of the emissions units contained in this permit are subject to the Consent Decree for settlement of the Civil Action No. 3:04 CV 00418, entered and filed on 2/12/2008, in the United States District Court for Southern District of Ohio Western Division. The settlement will be referred to as the “Consent Decree” throughout this permit.

6. As required by the Consent Decree and specified in 40 C.F.R Part 63.6(e)(3), the permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the Startup, Shutdown, and Malfunction Plan (SSMP) (Revision 2.0, October 2008 or the most recent

acceptable update of this plan) submitted October 27, 2008 for operating and maintaining affected emissions units during periods of startup, shutdown, and malfunction.

7. As required by the Consent Decree, the permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the "TANKER LOADING" Standard Operating Procedure manual (Rev 2, 6/10 or the most recent acceptable update of this plan) for loading tanker trucks.

8. As required by the Consent Decree, the permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the "MATERIAL ACCEPTANCE" Standard Operating Procedure manual (Rev 1, 6/08 or the most recent acceptable update of this plan) for assuring the facility will not violate limitations of this permit, Subpart DD, or cause excessive odors off-site from the facility.

9. As required by the Consent Decree, the permittee shall implement and follow the procedures, recordkeeping and reporting requirements specified in the "SOLIDIFICATION PROCESS" Standard Operating Procedure manual (Rev 0, 7/07 or the most recent acceptable update of this plan) to set operating limitations on the solidification process to maintain unit exemption pursuant to 40 CFR Part 63, Subpart DD.

10. The permittee shall implement on-going measures to minimize and reduce odors from all emissions units at the facility. As required by the Consent Decree, the permittee shall implement a community response plan that includes (1) public communication, (2) investigation procedures for responding to air pollution and odor complaints, (3) quarterly newsletters, and (4) recordkeeping. The permittee shall share community response plan records with the appropriate Ohio EPA District office or local air agency when requested.

11. Emissions units T108, T109, T110, T111, T112, T113, T114, and T115 were permitted under Permit To Install (PTI) #P0106269, issued 06/28/2010, and are included in the combined organic compound emissions limitation cited in this permit.

12. The emissions of organic compounds (OC) combined for the facility shall not exceed 24.36 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of OC (Tons)
1	2.03
1-2	4.06
1-3	6.09
1-4	8.12
1-5	10.15
1-6	12.18

1-7	14.21
1-8	16.24
1-9	18.27
1-10	20.30
1-11	22.33
1-12	24.36

After the first 12 calendar months following the issuance of this permit, compliance with the annual emissions limitation for OC shall be based upon a rolling, 12-month summation of the monthly emissions. The permittee shall calculate and maintain monthly records of the OC emissions and the rolling 12-month emissions of OC. Compliance shall be based upon the record keeping requirements specified in B.13 of this permit and in accordance with the applicable compliance method in B.16.

13. The permittee shall maintain monthly records of the following information:

    a) the number of hours the facility operated;

    b) the number of hours the close-vent and RTO system operated;

    c) the number of hours when any units controlled by the RTO were in operation when their emissions were either not vented to the RTO or the RTO was not in operation;

    d) the controlled OC emissions for emissions units controlled by the closed-vent and RTO system when the control system was operating; and the uncontrolled OC emissions for when the control system was not operating;

    e) the OC emissions for emissions units not controlled by the closed-vent and RTO system;

    f) the total monthly OC emission rate [13.d) plus 13.e)] for each month of operation; and

    g) beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the monthly emissions.

    Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative OC emissions for each calendar month.

14. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for OC and for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports are due by the date prescribed in the Standard Terms and Conditions of this permit under Section A.

15. The permittee shall submit annual reports that specify the OC emissions from the facility for the previous calendar year. The reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

16. Compliance with the emission limitations in B.12 shall be determined in accordance with the following methods:

a) Emission Limitation:

The OC emissions shall not exceed 24.36 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with this emissions limitation shall be demonstrated as follows:

(1) For emissions units controlled by the closed-vent and RTO system – Oil/Water Separators and Tanks, Level 2:

a. The maximum hourly OC emissions of 3.69 lbs/hour from these emissions units is determined from stack testing (conducted on 8/19 – 8/21, 2010) by multiplying the measured uncontrolled emissions of 56.70 lbs/hr OC as propane by the minimum required destruction efficiency of (1- 0.95%) and then multiplying by a factor of 1.30 (i.e., plus 30%) to account for production growth and production variations.

b. The maximum annual OC emissions of 16.2 tons/year from the RTO is determined by multiplying the hourly emissions from a)(1)a. by 8760 hours/year and dividing by 2000 lbs/ton.

c. The monthly OC emissions of 1.35 tons/month from the RTO is determined by dividing the annual emissions from a)(1)b. by 12 months/year.

d. Actual emissions for units controlled by the RTO are calculated by multiplying the uncontrolled emissions of OC as propane by the minimum actual destruction efficiency measured during the most recent emissions testing.

(2) For emissions units not controlled by the closed-vent and RTO system - Containers, Level 1 (includes emission units T108 - T115 permitted under PTI Permit #P0106269 issued 06/28/2010); Containers, Level 2; and Transfer Systems:

a. The maximum annual OC emissions of 8.2 tons/year from theses emissions units were determined using Water9 and Tanks4.9 modeling software, USEPA Document EPA-453/R95-017 (“Protocol for Equipment Leak Emission Estimate”, November 1995), USEPA Document EPA-453/R94-080A (“Air Emissions Models for Waste and Wastewater”, November 1994), or emission factors determined in “Expert Report of Thomas Robertson In the Matter of Barbara Fisher, et al versus Perma-Fix of Dayton, Inc.” dated December 15, 2006, resulting in a combined calculated OC emissions of 6.32 tons/year, and multiplied by factor of 1.30 to account for production growth and production. (Calculations by Thomas Robertson were for HAP only and are multiplied by an adjustment factor of 1.35, derived from speciation testing of RTO inlet emissions stream, to account for expected total OC.)

b. The maximum monthly OC emissions of 0.68 tons/month from these emissions units is determined by dividing the annual emissions from a)(2)a. by 12 months/year.

c. The hourly OC emissions of 1.87 lbs/hour from these emissions units is determined by multiplying the annual emissions from a)(2)a. by 2000 lbs/ton and dividing by 8760 hours/year.

(3) The monthly emissions limitation of 2.03 tons/month is determined by the summation of a)(1)c. and a)(2)b. Compliance shall be based upon the record keeping requirements specified in B.13 of this permit.

(4) The annual emissions limitation of 24.4 tons/year is determined by multiplying the monthly emission limitation from a)(3) by 12 months/year.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Containers, Level 1: P029

EU ID	Operations, Property and/or Equipment Description
P029	drum bulking, waste containers 0.1 to 0.46 m3

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a. and b)(2)f. below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b. through b)(2)d. below.
c.	40 CFR Part 63, Subpart A	See b)(2)e. below.
d.	OAC rule 3745-21-07(M)(3)(c)(ii)	The uncontrolled potential to emit for organic emissions from this emissions unit does not exceed 40 pounds per day.

(2) Additional Terms and Conditions

a. This emissions unit was installed prior to August 3, 2006, therefore, is still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).

b. All equipment and components associated with this emissions unit must comply with the applicable requirements included in Section B – Facility Wide Terms and Conditions.

c. The standards that apply to this emissions unit are identified in Section 63.688(b)(1) of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, and

Section 63.922 of Subpart PP of 40 CFR Part 63 - National Emission Standards for Containers.

d. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in "The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD", EPA-456/R-99-007, October 4, 1999.

e. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.

f. This emissions unit must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.5 – Facility Wide Terms and Conditions.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.688(b)(1) of Subpart DD and 63.922(b) – (c) of 40 CFR Part 63 Subpart PP	level 1 standards and control for containers
63.688(b)(1) of Subpart DD and 63.922(d) of 40 CFR Part 63 Subpart PP	operation of containers using level 1 controls
63.688(b)(1) of Subpart DD and 63.922(e) of 40 CFR Part 63 Subpart PP	inspection of containers using level 1 controls

(2) The design capacity of this emission unit shall not exceed 0.46 m^3 and shall not be used for treatment of material by a waste stabilization process as defined in section 63.681of 40 CFR Part 63, Subpart DD.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following sections:

63.688(b)(1) of Subpart DD, and 63.922(e) and 63.926(a) of 40 CFR Part 63 Subpart PP	inspection of containers using level 1 controls

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.697(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) This PTI supersedes PTI 08-04938 issued 03/02/2009 for this emissions unit.

2. Emissions Unit Group - Containers, Level 2: P030, P031, P032, P033, P034, P035, P036, P037, P038

EU ID	Operations, Property and/or Equipment Description
P030	tricanter solids receiving drum (drum -006; tricanter solids discharge to 55 gallon drum))
P031	sweco-02 solids receiving drum (drum-005; sweco oily solids discharge to 55 gallon drum))
P032	evaporator bottoms tote (tote-203; evaporator sludge collection (oil/water) in 250 gallon tote)
P033	condensate light ends receiver tote (tote-205; light hydrocarbon 250 gallon potable tote)
P034	drum bulking, waste containers > 0.46 m3
P035	drum bulking, hazardous waste tanker trucks
P036	filter press permeate tote (tote-807; filter press hazardous permeate receiving tote, 250 gallon)
P037	sweco-01 solids receiving drum (drum-007; sweco oil solids discharge to 55 gallon drum)
P038	building B wastewater treatment filter cake roll-off container, 20-yd3

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a. and b)(2)f. below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b. through b)(2)d. below.
c.	40 CFR Part 63, Subpart A	See b)(2)e. below.
d.	OAC rule 3745-21-07(M)(3)(c)(ii)	The uncontrolled potential to emit for organic emissions from each emissions unit does not exceed 40 pounds per day.

(2) Additional Terms and Conditions

a. These emissions units were installed prior to August 3, 2006, therefore, are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).

b. All equipment and components associated with these emissions unit must comply with the applicable requirements included in Section B – Facility Wide Terms and Conditions.

c. The standards that apply to these emissions units are identified in Section 63.688(b)(3) of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, and Section 63.923 of Subpart PP of 40 CFR Part 63 - National Emission Standards for Containers.

d. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in "The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD", EPA-456/R-99-007, October 4, 1999.

e. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.

f. These emissions units must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.5 – Facility Wide Terms and Conditions.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.688(b)(3) of Subpart DD and 63.923(b) of 40 CFR Part 63 Subpart PP	level 2 standards and control for containers
63.688(b)(3) of Subpart DD and 63.923(c) – (d) of 40 CFR Part 63 Subpart PP	operation of containers using level 2 controls
63.688(b)(3) of Subpart DD, and 63.923(b) and 63.926(a) of 40 CFR Part 63 Subpart PP	criteria for containers that can be used for level 2 control

(2) These emissions unit shall not be used for treatment of material by a waste stabilization process as defined in section 63.681 of 40 CFR Part 63, Subpart DD.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following sections:

63.688(b)(3) of Subpart DD, and 63.923(e) and 63.926(a) of 40 CFR Part 63 Subpart PP	inspection of containers using level 2 controls
63.688(b)(3) of Subpart DD, and 63.923(b)(1) and 63.923(f) of 40 CFR Part 63 Subpart PP	procedures to determine containers meet U.S. DOT regulations when using that level 2 control option
63.688(b)(3) of Subpart DD, and 63.923(b)(2) and 63.925(a) of 40 CFR Part 63 Subpart PP	procedures to determine containers operate with no detectable organic emissions when using that level 2 control option
63.688(b)(3) of Subpart DD, and 63.923(b)(2) and 63.925(b) of 40 CFR Part 63 Subpart PP	procedures to determine containers are vapor tight when using that level 2 control option

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.697(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) This PTI supersedes PTI 08-04938 issued 03/02/2009 for these emissions units.

3. Emissions Unit Group - Oil/Water Separators: P002, P003, P004, P005, P006, P007. Each unit has fixed roof vented through closed-vent system to a demister followed by a RTO control device equipped with a VOC entrapment chamber at the outlet of the RTO.

EU ID	Operations, Property and/or Equipment Description
P002	oil/water separator (T-402)
P003	tricanter
P004	centrifuge 1
P005	centrifuge 3
P006	sweco-01 (sweco vibratory screen)
P007	sweco-02 (sweco vibratory screen)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a., b)(2)h. and c)(2) below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b. through b)(2)f. below.
c.	40 CFR Part 63, Subpart A	See b)(2)g below.
d.	OAC rule 3745-21-07(M)(3)(c)(iv)	The capture and control efficiency established pursuant to this rule is less stringent than the capture and control efficiency established according to OAC rule 3745-31-05(A)(3) and 40 CFR Part 63 Subpart DD.

(2) Additional Terms and Conditions

a. These emissions units were installed prior to August 3, 2006, therefore, are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).

b. All equipment and components and the closed-vent system associated with these emissions unit must comply with the applicable requirements included in Section B – Facility Wide Terms and Conditions.

c. The standards that apply to these emissions units are identified in Section 63.686 of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, and Section 63.1044 of Subpart VV - National Emission Standards for Oil-Water Separators and Organic-Water Separators.

d. The total OC (less methane and ethane) or total HAP (see Table 1 to Subpart DD of 40 CFR Part 63) emissions from these emissions units shall be controlled by the RTO and must be destroyed by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC (less methane and ethane) or HAP, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen. The RTO shall be equipped and operated with a VOC entrapment chamber at the outlet of the RTO.

e. Subpart DD of 40 CFR Part 63 contains a provision that allows 240 hours of operation without the RTO during "planned routine maintenance" as defined under 40 CFR Part 63.693(b)(3)(i). During planned routine maintenance, these emissions units are subject to OAC rule 3745-15-06(A)(3). Malfunctions of the air pollution control equipment are subject to reporting requirements of OAC rule 3745-15-06(B).

f. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in “The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD”, EPA-456/R-99-007, October 4, 1999.

g. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.

h. These emissions units must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.5 – Facility Wide Terms and Conditions.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.686(b)(2)	fixed roof standards (collection and control) for oil-water separators and

	organic-water separators
63.693(c)(1)(ii)	closed-vent system requirements
63.693(b)(3)	operation, shutdown, and routine maintenance of control device
63.693(f)	vapor incinerator control device requirements (destruction efficiency)

(2) In accordance with Consent Decree and criteria specified in 40 CFR Part 63.686(b)(2), emissions from the emissions units listed above shall be captured and controlled using a fixed roof that is vented through a closed-vent system to a control device in accordance with applicable provisions specified in 40 CFR Part 63 Subpart VV-National Emissions Standards for Oil-Water Separators and Organic-Water Separators, and the emissions shall be directed to a RTO for control.

For the emissions units listed above, the OC emissions from each unit shall be vented through the closed-vent system to the RTO anytime the unit is in service and operational. The permittee shall operate the closed-vent system and RTO for control of emissions whenever one or more of the emissions units are in operation.

(3) In accordance with the Consent Decree and to satisfy requirements of this permit, the permittee shall operate and maintain a continuous monitoring and recording system which measures and records the combustion chamber temperature, recovery bed temperature, and stack exhaust temperature for the RTO when the emissions units are in operation. The monitoring and recording devices shall meet the accuracy specification listed in 40 CFR Part 63.693(f)(3)(i). The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and conform with the criteria of 40 CFR Part 63.695(e).

(4) In accordance with the Consent Decree and criteria specified in 40 CFR Part 63.693(c)(1)(ii), the closed-vent system shall be designed and operated at a pressure below atmospheric pressure. A permanent pressure monitor shall be installed at a location(s) on the closed-vent system that will verify that negative pressure is being maintained in the entire closed-vent system when the emissions units and control device are operating.

(5) In accordance with the Consent Decree, a pressure monitor shall be installed at a location immediately upstream of the RTO fan. A data acquisition system shall be installed and operated to continuously monitor and record the pressure inside the closed-vent system at this location. The pressure 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, and conform with the criteria of 40 CFR Part 63.695(e).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.693(c)(1)(ii)	monitor pressure in closed-vent system
63.693(b)(4) and 63.695(c)	inspection, monitoring and recordkeeping requirements of closed-vent system
63.693(b)(5) through (6), 63.696(b) and 63.695(e)	monitoring and recordkeeping requirements of control device
63.693(f)(3)	monitoring and recording temperature for vapor incinerator control device
63.695(e)(4)	excursion determination and criterion for control device
63.696(b)	recordkeeping requirements for control device
63.696(g)	semiannual records for planned routine maintenance operations for control device
63.696(h)	records for unexpected control device malfunctions

(2) In accordance with the Consent Decree, the permittee shall perform quarterly inspections of the closed-vent system using the procedures outlined in 40 CFR Part 63.695(c).

(3) In order to maintain compliance with applicable emission limitations/control requirements contained in this permit, the acceptable daily average value, as defined in 40 CFR Part 63.695(e)(2), for the combustion temperature measured within the RTO, when the emissions units controlled by the RTO are in operation, shall not be less than 1548 degrees Fahrenheit or not less than the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance. (The minimum combustion temperature was determined to be 1548 degrees Fahrenheit from compliance demonstration testing conducted on 8/19 – 8/21, 2009.).

(4) In order to maintain compliance with Consent Decree and requirements contained in this permit, the recovery bed temperature and stack exhaust temperature for the RTO must be continuously measured when the emissions units controlled by the RTO are in operation.

(5) In accordance with the Consent Decree and in order to maintain compliance with the applicable emission limitations/control requirements contained in this permit, the permittee shall observe the pressure monitor(s) installed on the closed-vent system specified in c)(4) above at least once per day on days the emissions units are operating, and record the observed measured pressure. The pressure monitoring locations shall include those which were monitored during the most recent performance stack test that demonstrated that negative pressure was maintained in the entire closed-vent system. In the event the pressure monitor(s) indicates there is not negative pressure in the closed-vent system, the permittee shall take necessary action to remedy the problem as soon as possible including, but not limited to, taking applicable actions prescribed in its Startup, Shutdown, and Malfunction plan. Records associated with these requirements shall be kept on site and available for inspection for a minimum of three years.

(6) In accordance with the Consent Decree and in order to maintain compliance with the applicable emission limitations/control requirements contained in this permit, the acceptable daily average value for the pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan as specified in c)(5) above, when the emissions units controlled by the RTO are in operation, shall be at a minimum differential pressure that is not less than the minimum differential pressure established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance (The minimum differential pressure was determined to be -0.96 inch water from compliance demonstration testing conducted on 8/19 – 8/21, 2009.).

(7) The permittee shall collect and record the following information each day for the capture and control equipment:

a. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the combustion temperature within the RTO was less than the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;

b. all days and instances when the emissions units controlled by the RTO were in operation during which the recovery bed temperature and stack exhaust temperature for the RTO were not measured;

c. all days and instances when the emissions units were in operation, when it was observed that any of the pressures recorded per c)(4) above for the closed-vent system were not negative;

d. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan was less than the minimum differential pressure established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance; and

e. a log of the downtime for the closed-vent system, RTO, VOC entrapment chamber, and monitoring equipment when the associated emissions units were in operation.

(8) Whenever the monitored daily average value for the combustion temperature for the RTO; the daily average value for pressure measured inside the closed-vent system immediately upstream of the RTO fan; or the pressures of the closed-vent system deviates from the limits specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date the corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature readings and/or pressure differential readings, as appropriate, immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.697(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of	reporting requirements

40 CFR Part 63 Subpart A	
63.697(a)(1) of Subpart DD and 63.9(h) of 40 CFR Part 63 Subpart A	notification of compliance status, within 60 days after compliance demonstration activity (performance test)
63.697(b)(1)	notification of performance tests
63.697(b)(2)	performance test reports
63.697(b)(3)	startup, shutdown, and malfunction reports
63.697(b)(4)	semi-annual summary report

(2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the closed-vent system and the RTO during the operation of the emissions units:

a. each day when the average daily combustion temperature measured for the RTO fell below the minimum temperature limitations specified in this permit;

b. each day and instance when the recovery bed temperature and stack exhaust temperature for the RTO were not measured;

c. each day and instance when it was observed that any of the pressures in the closed-vent system were not negative;

d. each day when the daily average pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan was less than the minimum differential pressure limitation specified in this permit;

e. an identification of each incident of deviation described in d)(8) above where a prompt investigation was not conducted;

f. an identification of each incident of deviation described in d)(8) where prompt corrective action, that would bring the specified parameters into compliance with the acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident of deviation described in d)(8) where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(3) The permittee shall submit deviation (excursion) reports that identify any of the following when the emissions units were in operation:

a. dates and time periods when the OC emissions were not vented to the RTO;

b. dates and times when the VOC entrapment chamber was not operable;

c. dates and time periods when the monitored daily average value for the combustion temperature for the RTO; the daily average value for pressure measured inside the closed-vent system immediately upstream of the RTO fan; or the pressures of the closed-vent system deviated from the limits specified in this permit.

These reports shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

(1) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.694(a)(11) and 63.694(l)	Testing methods and procedures to determine closed-vent and control device performance

(2) Emission Limitation:

The total OC (less methane and ethane) or total HAP [defined in 40 CFR Part 63.693(f)(1)(ii) and Table 1 of 40 CFR Part 63, Subpart DD emissions from these emissions units shall be controlled by the RTO and must be destroyed by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC, less methane and ethane, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen.

Applicable Compliance Method:

Capture of the OC emissions from these emissions units shall be achieved by use of a closed-vent system. The system shall be maintained under sufficient negative pressure to assure all of the emissions from the emissions units are captured. 40 CFR Part 63, Subpart DD requires that the permittee demonstrate the control device achieves the applicable performance requirements by conducting a compliance performance test of the closed-vent system and the control device (RTO) in accordance with the requirements specified in 40 CFR Part 63.693.

When conducting the performance test, 40 CFR Part 63 Subpart DD requires testing to be performed in accordance with and using the testing and procedures prescribed in 40 CFR Parts 63.694(a)(11) and 63.694(l). The sampling sites shall be selected using Method 1 or 1A of 40 CFR Part 60, appendix A , as appropriate, in accordance with 40 CFR Part 63.694(l)(1)(i). The gas volumetric flow rate shall be determined using Method 2, 2A, 2C, or 2D of 40 CFR Part 60, appendix A, as appropriate, in accordance with 40 CFR Part 63.694(l)(2). Compliance with the RTO total OC or total HAP destruction requirement shall be determined in accordance with the methods and procedures specified in 40 CFR Part 63.694(l)(3). To determine the RTO percent destruction

efficiency, the owner or operator shall use Method 18 of 40 CFR Part 60, appendix A. Alternatively, any other method or data that has been validated according to the applicable procedures in Method 301 in 40 CFR Part 63, appendix A of this part may be used with approval of US EPA and the appropriate Ohio EPA District office or local air agency. The procedures specified in 40 CFR Parts 63.694(l)(3)(i) through (iii) shall be used to calculate percent destruction efficiency.

(3) The permittee shall conduct, or have conducted, emissions and compliance demonstration testing on these emissions units in accordance with the following requirements:

a. Emissions testing shall be conducted to demonstrate compliance with the required overall control efficiency of 95%. The following test methods as specified in 40 CFR Subpart DD shall be employed to measure the mass emission rates before and after the RTO to demonstrate compliance with the destruction requirement: USEPA test Methods 1 through 4 and 18 of CFR Part 60, Appendix A.

b. An evaluation of the closed-vent system shall be conducted in conjunction with the compliance demonstration testing of the RTO in accordance with the following requirements.

i. Perform an inspection of the closed-vent system for defects that could result in emissions leaks using the procedures outlined in 40 CFR Part 63.695(c)(2).

ii. Measure the pressure differential between the inside of the closed-vent system and the atmosphere [see c)(4), c)(5), d)(5) and d)(6) above] during compliance demonstration of the RTO to demonstrate compliance with the requirement that the closed-vent system be maintained under negative pressure.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions units and the testing procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.

The testing shall be conducted while the emissions units are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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 appropriate Ohio EPA District Office or Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA.

(4) A compliance demonstration test was conducted on August 18 - 21, 2009 measuring an average OC control and destruction efficiency of 96.8% for the closed-vent system, RTO and VOC entrapment chamber system and fulfills the requirements of f)(3).

g) Miscellaneous Requirements

(1) This PTI supersedes PTI 08-04938 issued 03/02/2009 for these emissions units.

4. Emissions Unit Group - Tanks, Level 1: T044, T045, T046, T047, T048, T049, T050, T051, T052, T053, T054, T055, T056, T057, T058, T059, T060, T061, T062

EU ID	Operations, Property and/or Equipment Description
T044	S-71 (oily wastewater storage tank, 5,000 gallon)
T045	T-706B (bioplant equalization feed tank, 185,392 gallon)
T046	S-1 (process oils storage tank, 16,700 gallon)
T047	S-2 (process oils storage tank, 15,700 gallon)
T048	S-3 (process oils storage tank, 15,000 gallon)
T049	S-4 (cut oils storage tank, 15,000 gallon)
T050	S-6 (raw oils storage tank, 15,000 gallon)
T051	S-7 (raw oils storage tank, 15,000 gallon)
T052	S-13 (process oils storage tank, 30,000 gallon)
T053	S-14 (storage tank, 20,300 gallon)
T054	S-21 (storage tank, 16,700 gallon)
T055	S-22 (crank case oils storage tank, 17,500 gallon)
T056	S-23 (crank case oils storage tank, 18,350 gallon)
T057	S-24 (crank case oils storage tank, 15,000 gallon)
T058	S-28 (crank case oils storage tank, 14,400 gallon)
T059	W-4 (raw oil solids storage tank, 19,000 gallon)
T060	T609A (processed oil storage tank, 187,000 gallon)
T061	T-609B (processed oil storage tank, 187,000 gallon)
T062	T-609C (processed oil storage tank, 187,000 gallon)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a. and b)(2)f. below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b. through b)(2)d. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 63, Subpart A	See b)(2)e. below.
d.	OAC rule 3745-21-07(M)(3)(c)(ii)	The uncontrolled potential to emit for organic emissions from each emissions unit does not exceed 40 pounds per day.
e.	40 CFR Part 60, Subpart Kb (applicable to only emissions units T045, T060, T061, and T062)	The requirements established pursuant to this rule are less stringent than requirements established according to OAC rule 3745-05(A)(3) and 40 CFR Part 63 Subpart DD. See d)(4). below.

(2) Additional Terms and Conditions

a. These emissions units were installed prior to August 3, 2006, therefore, are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).

b. All equipment and components associated with these emissions unit must comply with the applicable requirements included in Section B – Facility Wide Terms and Conditions.

c. The standards that apply to these emissions units are identified in Section 63.685 of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations, and Section 63.902 of Subpart OO - National Emission Standards for Tanks - Level 1.

d. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in “The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD”, EPA-456/R-99-007, October 4, 1999.

e. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.

f. These emissions units must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.5 – Facility Wide Terms and Conditions.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.685(b)(1), 63.685(c) and Table 3 of Subpart DD, and 63.902(b) of 40 CFR Part 63 Subpart OO	level 1 standards and control for tanks

63.685(c)(1) of Subpart DD and 63.902(c) of 40 CFR Part 63 Subpart OO	operation of tanks using level 1 controls

(2) As an alternative to controlling emissions from these emissions units using Tank Level 1 controls, the permittee may control the emissions from these emissions units using Tank Level 2 controls in accordance the provisions and requirements specified in 63.685(c)(2)(ii) and 63.685(d) of 40 CFR Part 63 Subpart DD.

(3) Per 63.685(b)(1) and Table 3 of 40 CFR Part 63 Subpart DD, the HAP vapor pressure of off-site material managed in the following emissions units shall be:

emissions unit ID	tank design capacity	maximum HAP vapor pressure
T044, T046-T051, T054-T059	less than 75 m^3 (19,813 gallon)	less than 76.6 kPa
T052, T053	equal to or greater than 75 m3 (19,813 gallon) and less than 151 m3 (39,900 gallon)	less than 27.6 kPa
T045,T060-T062	equal to or greater than 151 m3 (39,900 gallon)	less than 5.2 kPa

(4) The permittee shall notify appropriate Ohio EPA District office or local air agency, and submit an application for and obtain a modification to this permit to install before managing materials in these emissions units that exceeds the HAP vapor pressures specified above.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following sections:

63.685(c) of Subpart DD and 63.906(a) & (b) of 40 CFR Part 63 Subpart OO	inspection and monitoring of tanks using level 1 controls
63.685(c) of Subpart DD and 63.907 of 40 CFR Part 63 Subpart OO	recordkeeping requirements of tanks using level 1 controls
63.694(j) of Subpart DD	determination, monitoring and recordkeeping of HAP vapor pressure of off-site materials managed in tanks

(2) The permittee shall conduct a visual inspection of the all containment areas for liquid leaks of off-site materials from tanks and transfer systems located within the containment areas at least once every operating day. Repairs must be made as soon as possible, and recordkeeping of the daily inspections and repairs shall be done, in accordance with the procedures identified in the "CONTAINMENT AREAS" Standard Operating Procedure manual (Rev 1, 6/10 or the most recent acceptable update of this plan) contained in Appendix C of the Consent Decree. These records must be retained at the facility for a minimum of three years.

(3) To demonstrate compliance with the HAP vapor pressure restrictions in section c) above, the permittee shall maintain records of the HAP vapor pressures for the off-site materials managed in each of these emissions units. In accordance with 63.685(c)(1) of 40 CFR Part 63 Subpart DD, the permittee shall determine the maximum HAP vapor pressure for off-site material composition managed in each of these emissions units using either direct measurement or by knowledge of the off-site materials. The permittee shall perform a new determination whenever changes to the off-site material managed in any of these emissions units could potentially cause the maximum HAP vapor pressure to increase to a level that could exceed the HAP vapor pressure restrictions listed above.

Determination of the HAP vapor pressure by direct measurement of the off-site materials shall be done using sampling procedures and analysis methods specified in 63.694(j)(2) of 40 CFR Part 63 Subpart DD. If using knowledge of the off-site materials to determine the HAP vapor pressure, documentation shall prepared and recorded in accordance with 63.694(j)(3) of 40 CFR Part 63 Subpart DD that presents the information used as the basis for the knowledge that the maximum HAP vapor pressure of the off-site material is less than the vapor pressure restrictions listed above.

(4) Per 60.116b(b) of 40 CFR Part 60 Subpart Kb, the owner or operator of each storage vessel as specified in 40 CFR Part 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.697(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements

f) Testing Requirements

(1) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.685(c) of Subpart DD, and 63.902(c)(2) and 63.905 of 40 CFR Part 63 Subpart OO	testing methods and procedures to demonstrate container meets level 1 control performance

g) Miscellaneous Requirements

(1) This PTI supersedes PTI 08-04938 issued 03/02/2009 for these emissions units.

5. Emissions Unit Group - Tanks, Level 2: T063, T064, T065, T066, T067, T068, T069, T070, T071, T072, T073, T074, T075, T076, T077, T078, T079, T080, T081, T082, T083, T084, T085, T086, T087, T088, T089, T090, T091, T092, T093, T094, T095, T096, T097, T098, T099, T100, T101, T102, T103, T104, T105, T106, T107. Each unit has fixed roof vented through closed-vent system to a demister followed by a RTO control device equipped with a VOC entrapment chamber at the outlet of the RTO.

EU ID	Operations, Property and/or Equipment Description
T063	OR-1 (wastewater storage tank, 72,000 gallon)
T064	T-002 (OR-1 oil phase receiving tank, 2,000 gallon)
T065	T-001 (oil/water separator oil phase receiving tank, 500 gallon)
T066	OR-2 (wastewater 72,000 gallon storage tank)
T067	surge tank (T-206; UF permeate surge tank, 1,500 gallon)
T068	T-1 (T-601; wastewater chemical conditioning tank, 4,000 gallon)
T069	T-2 (T-506; wastewater sludge settling tank, 3,500 gallon)
T070	TW-1 (T-605; treated process waters storage tank, 16,000 gallon)
T071	TW-1a (TW-1 surge tank, 800 gallon)
T072	T-602 (chemical conditioning tank 2, 49 gallon)
T073	T-603 (chemical conditioning tank 3, 296 gallon)
T074	lamella (T-604, 2,080 gallon)
T075	G-1 (T-801A; G-cone high solids process vessel, 14,080 gallon)
T076	G-2 (T-801B; G-cone high solids process vessel, 14,080 gallon)
T077	G-3 (T-801C; G-cone high solids process vessel, 14,080 gallon)
T078	T-808 (filter press feed tank, 6,500 gallon)
T079	B-1 (process oils storage tank, 30,000 gallon)
T080	B-2 (process oils storage tank, 17,500 gallon)
T081	B-3 (process oils storage tank, 30,000 gallon)
T082	B-4 (process oils storage tank, 30,000 gallon)
T083	C-2 (wastewater storage tank, 15,000 gallon)
T084	C-3 (raw oils solids storage tank, 15,000 gallon)
T085	C-4 raw oil storage tank, 15,000 gallon)
T086	P-1 (process oils storage tank, 18,500 gallon)
T087	P-2 (process oils storage tank, 18,500 gallon)
T088	R-1 (raw oils storage tank, 20,000 gallon)
T089	R-2 (raw oils storage tank, 20,000 gallon)
T090	S-9 (storage tank, 30,000 gallon)
T091	S-10 (raw oils storage tank, 30,000 gallon)
T092	S-11 (raw oils storage tank, 30,000 gallon)
T093	S-12 (raw oils storage tank, 30,000 gallon)
T094	S-25 (crank case oils storage tank, 15,000 gallon)
T095	S-26 (crank case oils storage tank, 16,700 gallon)
T096	S-27 (crank case oils storage tank, 23,400 gallon)
T097	W-1 (raw oils storage tank, 30,000 gallon)
T098	W-2 (raw oils storage tank, 18,000 gallon)
T099	W-5 (wastewaters storage tank, 23,000 gallon)
T100	W-6 (wastewaters storage tank, 23,000 gallon)
T101	tricanter oil receiving tank (T-006, 1,000 gallon)
T102	centrifuge oil phase receiving tank (T-003, 1,000 gallon)

EU ID	Operations, Property and/or Equipment Description
T103	centrifuge water phase receiving tank (T-004, 1,000 gallon)
T104	sweco-02 oil receiving tank (T-005, 200 gallon)
T105	sweco-01 oil receiving tank (T-007, 1,500 gallon)
T106	SBR (T-705; high cod wastewaters, 125,000 gallon)
T107	VDR (T-703; high cod wastewaters, 425,000 gallon)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a., b)(2)h., b)(2)i., c)(2) and c)(6) below.
b.	40 CFR Part 63, Subpart DD	See b)(2)b. through b)(2)f. below.
c.	40 CFR Part 63, Subpart A	See b)(2)g. below.
d.	OAC rule 3745-21-07(M)(3)(c)(iv)	The control efficiency established pursuant to this rule are less stringent than the limitations established according to OAC rule 3745-31-05(A)(3) and 40 CFR Part 63 Subpart DD.
e.	40 CFR Part 60, Subpart Kb (applicable to only emissions units T063, T066, T106, and T107)	The requirements established pursuant to this rule are less stringent than requirements established according to OAC rule 3745-05(A)(3) and 40 CFR Part 63 Subpart DD. See d)(13). below.

(2) Additional Terms and Conditions

a. These emissions units were installed prior to August 3, 2006, therefore, are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).

b. All equipment and components and the closed-vent system associated with these emissions unit must comply with the applicable requirements included in Section B – Facility Wide Terms and Conditions.

c. The standards that apply to these emissions units are identified in Section 63.685 of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations.

d. The total OC (less methane and ethane) or total HAP (see Table 1 to Subpart DD of 40 CFR Part 63) emissions from these emissions units shall be controlled by the RTO and must be destroyed by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC (less methane and ethane) or HAP, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen. The RTO shall be equipped and operated with a VOC entrapment chamber at the outlet of the RTO

e. Subpart DD of 40 CFR Part 63 contains a provision that allows 240 hours of operation without the RTO during "planned routine maintenance" as defined under 40 CFR Part 63.693(b)(3)(i). During planned routine maintenance, these emissions units are subject to OAC rule 3745-15-06(A)(3). Malfunctions of the air pollution control equipment are subject to reporting requirements of OAC rule 3745-15-06(B).

f. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in “The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD”, EPA-456/R-99-007, October 4, 1999.

g. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.

h. These emissions units must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.5 – Facility Wide Terms and Conditions.

i. In accordance with the Consent Decree, the permittee has committed to applying the following additional controls to the bioplant, emissions units T106 and T107. See operational restrictions term c)(6).

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.685(d)(3) and (g)	standards for tanks using level 2 control by using a closed-vent system to a control device
63.685(d)(3) and (g)(2)	operation of tanks using level 2 control by using a closed-vent system to a control device
63.693(c)(1)(ii)	requirements for closed-vent system designed to operate below atmospheric pressure
63.693(c)(2)	requirements for closed-vent system that includes bypass device
63.693(b)(3)	operation, shutdown, and routine maintenance of control device
63.693(f)	vapor incinerator control device requirements
63.693(f)(1)	performance specifications for vapor incinerator control device (destruction efficiency)

(2) In accordance with the Consent Decree and criteria specified in 40 CFR Part 63.685(d)(3) and (g), emissions from the emissions units listed above shall be captured and controlled using a fixed roof that is vented through a closed-vent system to a control device and the emissions shall be directed to a RTO for controlling the emissions.

For the emissions units listed above, the OC emissions from each unit shall be shall be vented through the closed-vent system to the RTO anytime the unit is in service and operational. The permittee shall operate the closed-vent system and RTO for control of emissions whenever one or more of the emissions units are in operation.

(3) In accordance with the Consent Decree and to satisfy requirements of this permit, the permittee shall operate and maintain a continuous monitoring and recording system which measures and records the combustion chamber temperature, recovery bed temperature, and stack exhaust temperature for the RTO when the emissions units are in operation. The monitoring and recording devices shall meet the accuracy specification listed in 40 CFR Part 63.693(f)(3)(i). The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and conform with the criteria of 40 CFR Part 63.695(e).

(4) In accordance with the Consent Decree and criteria specified in 40 CFR Part 63.693(c)(1)(ii), the closed-vent system shall be designed and operated at a pressure below atmospheric pressure. A permanent pressure monitor shall be installed at a location(s) on the closed-vent system that will verify that negative pressure is being

maintained in the entire closed-vent system when the emissions units and control device are operating.

(5) In accordance with the Consent Decree, a pressure monitor shall be installed at a location immediately upstream of the RTO fan. A data acquisition system shall be installed and operated to continuously monitor and record the pressure inside the closed-vent system at this location. The pressure 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, and conform with the criteria of 40 CFR Part 63.695(e).

(6) The following additional controls shall be employed for emissions units T106 and T107 (bioplant).

a. For each day the bioplant is fed, the emissions unit T106 ("SBR") and emissions unit T107 ("VDR") must maintain dissolved oxygen (DO) levels above 1.0 ppm during the last two hours of the aeration stage of each batch. The SBR and VDR tanks may fail to meet this limit, but not more than one batch every two calendar weeks, as long as the subsequent batch is extended so that the reactor is allowed to aerate until the DO level is above 1.0 ppm for at least two hours.

b. The wastewater feed to the SBR and VDR tanks shall have a maximum food to microorganism (F/M) ratio of 0.30, measured as pound total organic compounds (TOC) influent per pound mixed liquor volatile suspended solids (MLVSS). The wastewater feed TOC shall be sampled and measured from the bioplant feed tank, emissions unit T045 ("T-706B"). The MLVSS shall be sampled and measured from the SBR and VDR. Compliance with the F/M ratio shall be determined on a weekly average basis. The F/M ratio shall be calculated on a daily basis.

(7) The bioplant blowers shall not supply more than a total of 4,500 acfm of air to the SBR and VDR tanks, combined.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.693(c)(1)(ii)	monitor pressure in closed-vent system
63.693(b)(4), 63.685(g)(3) and 63.695(c)	inspection, monitoring and recordkeeping requirements of closed-vent system
63.693(b)(5) through (6), 63.696(b) and 63.695(e)	monitoring and recordkeeping requirements of control device
63.693(f)(3)	monitoring and recording temperature for vapor incinerator control device

63.695(e)(4)	excursion determination and criterion for control device
63.696(b)	recordkeeping requirements for control device
63.696(e)	inspection and monitoring of tanks using fixed roof
63.696(g)	semiannual records for planned routine maintenance operations for control device
63.696(h)	records for unexpected control device malfunctions

(2) In accordance with the Consent Decree, the permittee shall perform quarterly inspections of the closed-vent system using the procedures outlined in 40 CFR Part 63.695(c).

(3) In order to maintain compliance with applicable emission limitations/control requirements contained in this permit, the acceptable daily average value, as defined in 40 CFR Part 63.695(e)(2), for the combustion temperature measured within the RTO, when the emissions units controlled by the RTO are in operation, shall not be less than 1548 degrees Fahrenheit or not less than the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance. (The minimum combustion temperature was determined to be 1548 degrees Fahrenheit from compliance demonstration testing conducted on 8/19 – 8/21, 2009.).

(4) In order to maintain compliance with Consent Decree and requirements contained in this permit, the recovery bed temperature and stack exhaust temperature for the RTO must be continuously measured when the emissions units controlled by the RTO are in operation.

(5) In accordance with the Consent Decree and in order to maintain compliance with the applicable emission limitations/control requirements contained in this permit, the permittee shall observe the pressure monitor(s) installed on the closed-vent system specified in c)(4) above at least once per day on days the emissions units are operating, and record the observed measured pressure. The pressure monitoring locations shall include those which were monitored during the most recent performance stack test that demonstrated that negative pressure was maintained in the entire closed-vent system. In the event the pressure monitor(s) indicates there is not negative pressure in the closed-vent system, the permittee shall take necessary action to remedy the problem as soon as possible including, but not limited to, taking applicable actions prescribed in its Startup, Shutdown, and Malfunction plan. Records associated with these requirements shall be kept on site and available for inspection for a minimum of three years.

(6) In accordance with the Consent Decree and in order to maintain compliance with the applicable emission limitations/control requirements contained in this permit, the

acceptable daily average value for the pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan as specified in c)(5) above, when the emissions units controlled by the RTO are in operation, shall be at a minimum differential pressure that is not less than the minimum differential pressure established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance (The minimum differential pressure was determined to be -0.96 inch water from compliance demonstration testing conducted on 8/19 – 8/21, 2009.).

(7) The permittee shall collect and record the following information each day for the capture and control equipment:

a. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the combustion temperature within the RTO was less than the average minimum temperature established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance;

b. all days and instances when the emissions units controlled by the RTO were in operation during which the recovery bed temperature and stack exhaust temperature for the RTO were not measured;

c. all days and instances when the emissions units were in operation, when it was observed that any of the pressures recorded per c)(4) above for the closed-vent system were not negative;

d. all days when the emissions units controlled by the RTO were in operation during which the daily average value, as defined in 40 CFR Part 63.695(e)(2), for the pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan was less than the minimum differential pressure established during the most recent emissions test that demonstrated the emissions units and the capture and control equipment to be in compliance; and

e. a log of the downtime for the closed-vent system, RTO, VOC entrapment chamber, and monitoring equipment when the associated emissions units were in operation.

(8) Whenever the monitored daily average value for the combustion temperature for the RTO; the daily average value for pressure measured inside the closed-vent system immediately upstream of the RTO fan; or the pressures of the closed-vent system deviates from the limits specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

a. a description of the corrective action;

b. the date the corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature readings and/or pressure differential readings, as appropriate, immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

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

(11) In order to maintain compliance with the controls specified in operation restrictions term c)(6) above, the operational and procedural requirements identified in the "BIOPLANT – DISSOLVED OXYGEN AND MIXED LIQUOR VOLATILE SUSPENDED SOLIDS (MLVSS)" Standard Operating Procedures manual (Rev 0, 5/07 or the most recent acceptable update of this plan) contained in Appendix D of the Consent Decree shall be followed for measuring and maintaining DO levels and correct F/M levels in the Bioplant Sequencing Batch Reactor (SBR) and Variable Depth Reactor (VDR).

(12) The permittee shall conduct a visual inspection of the all containment areas for liquid leaks of off-site materials from tanks and transfer systems located within the containment areas at least once every operating day. Repairs must be made as soon as possible, and recordkeeping of the daily inspections and repairs shall be done, in accordance with the procedures identified in the "CONTAINMENT AREAS" Standard Operating Procedure manual (Rev 1, 6/10 or the most recent acceptable update of this plan) contained in Appendix C of the Consent Decree. These records must be retained at the facility for a minimum of three years.

(13) Per 60.116b(b) of 40 CFR Part 60 Subpart Kb, the owner or operator of each storage vessel as specified in 40 CFR Part 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.697(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements
63.697(a)(1) of Subpart DD and 63.9(h) of 40 CFR Part 63 Subpart A	notification of compliance status, within 60 days after compliance demonstration activity (performance test)
63.697(b)(1)	notification of performance tests
63.697(b)(2)	performance test reports
63.697(b)(3)	startup, shutdown, and malfunction reports
63.697(b)(4)	semi-annual summary report

(2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the closed-vent system and the RTO during the operation of the emissions units:

a. each day when the average daily combustion temperature measured for the RTO fell below the minimum temperature limitations specified in this permit;

b. each day and instance when the recovery bed temperature and stack exhaust temperature for the RTO were not measured;

c. each day and instance when it was observed that any of the pressures in the closed-vent system were not negative;

d. each day when the daily average pressure measured inside the closed-vent system at the location immediately upstream of the RTO fan was less than the minimum differential pressure limitation specified in this permit;

e. an identification of each incident of deviation described in d)(8) above where a prompt investigation was not conducted;

f. an identification of each incident of deviation described in d)(8) where prompt corrective action, that would bring the specified parameters into compliance with the acceptable range, was determined to be necessary and was not taken; and

g. an identification of each incident of deviation described in d)(8) where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(3) The permittee shall submit deviation (excursion) reports that identify any of the following when the emissions units were in operation:

a. dates and time periods when the OC emissions were not vented to the RTO;

b. dates and times when the VOC entrapment chamber was not operable;

c. dates and time periods when the monitored daily average value for the combustion temperature for the RTO; the daily average value for pressure measured inside the closed-vent system immediately upstream of the RTO fan; or the pressures of the closed-vent system deviated from the limits specified in this permit.

These reports shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

(1) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.694(a)(11) and 63.694(l)	testing methods and procedures to determine closed-vent and control device performance

(2) Emission Limitation:

The total OC (less methane and ethane) or total HAP [defined in 40 CFR Part 63.693(f)(1)(ii) and Table 1 of 40 CFR Part 63, Subpart DD emissions from these emissions units shall be controlled by the RTO and must be destroyed by 95 percent or more, on a total weight-basis, or, achieve a total oxidizer outlet concentration for the TOC, less methane and ethane, of less than or equal to 20 ppmv on a dry basis corrected to 3 percent oxygen.

Applicable Compliance Method:

Capture of the OC emissions from these emissions units shall be achieved by use of a closed-vent system. The system shall be maintained under sufficient negative pressure to assure all of the emissions from the emissions units are captured. 40 CFR Part 63, Subpart DD requires that the permittee demonstrate the control device achieves the applicable performance requirements by conducting a compliance performance test of the closed-vent system and the control device (RTO) in accordance with the requirements specified in 40 CFR Part 63.693.

When conducting the performance test, 40 CFR Part 63 Subpart DD requires testing to be performed in accordance with and using the testing and procedures prescribed in 40 CFR Parts 63.694(a)(11) and 63.694(l). The sampling sites shall be selected using

Method 1 or 1A of 40 CFR Part 60, appendix A , as appropriate, in accordance with 40 CFR Part 63.694(l)(1)(i). The gas volumetric flow rate shall be determined using Method 2, 2A, 2C, or 2D of 40 CFR Part 60, appendix A, as appropriate, in accordance with 40 CFR Part 63.694(l)(2). Compliance with the RTO total OC or total HAP destruction requirement shall be determined in accordance with the methods and procedures specified in 40 CFR Part 63.694(l)(3). To determine the RTO percent destruction efficiency, the owner or operator shall use Method 18 of 40 CFR Part 60, appendix A. Alternatively, any other method or data that has been validated according to the applicable procedures in Method 301 in 40 CFR Part 63, appendix A of this part may be used with approval of US EPA and the appropriate Ohio EPA District office or local air agency. The procedures specified in 40 CFR Parts 63.694(l)(3)(i) through (iii) shall be used to calculate percent destruction efficiency.

(3) The permittee shall conduct, or have conducted, emissions and compliance demonstration testing on these emissions units in accordance with the following requirements:

a. Emissions testing shall be conducted to demonstrate compliance with the required overall control efficiency of 95%. The following test methods as specified in 40 CFR Subpart DD shall be employed to measure the mass emission rates before and after the RTO to demonstrate compliance with the destruction requirement: USEPA test Methods 1 through 4 and 18 of CFR Part 60, Appendix A.

b. An evaluation of the closed-vent system shall be conducted in conjunction with the compliance demonstration testing of the RTO in accordance with the following requirements.

i. Perform an inspection of the closed-vent system for defects that could result in emissions leaks using the procedures outlined in 40 CFR Part 63.695(c)(2).

ii. Measure the pressure differential between the inside of the closed-vent system and the atmosphere [see c)(4), c)(5), d)(5) and d)(6) above] during compliance demonstration of the RTO to demonstrate compliance with the requirement that the closed-vent system be maintained under negative pressure.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions units and the testing

procedures provide a valid characterization of the emissions from the emissions units and/or the performance of the control equipment.

The testing shall be conducted while the emissions units are operating at or near their maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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 appropriate Ohio EPA District Office or Local Air Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA.

(4) A compliance demonstration test was conducted on August 18 - 21, 2009 measuring an average OC control and destruction efficiency of 96.8% for the closed-vent system, RTO and VOC entrapment chamber system and fulfills the requirements of f)(3).

g) Miscellaneous Requirements

(1) This PTI supersedes PTI 08-04938 issued 03/02/2009 for these emissions units.

6. Emissions Unit Group - Transfer Systems: P010, P011, P012, P013, P014, P015, P016, P018, P019, P020, P021, P022, P025, P026, P027, P028. Each unit uses continuous hard-piping.

EU ID	Operations, Property and/or Equipment Description
P010	building B wastewater transfer system (water transfer among bldg. B units)
P011	building B wastewater drain system (individual drain system, water transfer from bldg. B units)
P012	building B oil transfer system (process oil and solids knockout transfer from centrifuge system)
P013	evaporator and condenser transfer system
P014	hazardous waste transfer system (containers to tanker trucks)
P015	S-71 transfer system (hose/hard piping individual drain system)
P016	building G wastewater drain system (water transfer from G-1, G-2, G3 and filter press)
P018	building G wastewater solids and sludge transfer system
P019	bioplant wastewater transfer system (individual drain, water transfer among bioplant units)
P020	bioplant wastewater individual drain system (water transfer from bioplant to POTW)
P021	transfer pad A system (loading racks to tanks)
P022	containment pad A transfer system (tanks to treatment processes)
P025	containment pad B transfer system (tanks to treatment processes)
P026	containment pad C transfer system (tanks to treatment processes)
P027	transfer pad D transfer system, wastewater (wastewater and oils transfer from loading rack to tanks; tanks to treatment processes)
P028	containment pad E transfer system (tanks to treatment processes)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The permittee shall meet the requirements of 40 CFR Part 63, Subpart DD. See Section B.2 - Facility Wide Terms and Conditions. See b)(2)a., b)(2)d., b)(2)g., and c)(2) below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	40 CFR Part 63, Subpart DD	See b)(2)b through b)(2)e below.
c.	40 CFR Part 63, Subpart A	See b)(2)f below.
d.	OAC rule 3745-21-07(M)(3)(c)(iv)	The control efficiency established pursuant to this rule are less stringent than the limitations established according to OAC rule 3745-31-05(A)(3) and 40 CFR Part 63 Subpart DD.

(2) Additional Terms and Conditions

a. These emissions units were installed prior to August 3, 2006, therefore, are still subject to the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3).

b. All equipment and components associated with these emissions unit must comply with the applicable requirements included in Section B – Facility Wide Terms and Conditions.

c. The standards that apply to all these emissions units are identified in Section 63.689 of Subpart DD of 40 CFR Part 63 - National Emissions Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations. Emissions units P011, P015, P016, P019, and P020 are characterized as individual drain transfer systems according to definitions in Subpart DD and Subpart RR. Standards identified in Section 63.962 of Subpart RR - National Emission Standards for Individual Drain Systems apply to emissions units P011, P015, P016, P019, and P020, also.

d. The permittee shall use continuous hard-piping for all these transfer system emissions units which satisfies requirements of both Subpart DD and Subpart RR, and will comply with monitoring and recordkeeping requirements of Subpart RR and those included in d)(2) and d)(3). This will meet or exceed the level of control specified in the Consent Decree for these emissions units.

e. Additional explanation of monitoring, recordkeeping and requirements of Subpart DD is provided in “The Plain Language Assistance Document for 40 CFR Part 63 Subpart DD”, EPA-456/R-99-007, October 4, 1999.

f. Table 2 of Subpart DD of 40 CFR Part 63 – Applicability of Paragraphs in Subpart A (General Provisions) of Part 63 to Subpart DD identifies which parts of the General Provisions in Part 63.1-16 apply.

g. These emissions units must comply with Section V. Compliance Requirements of the Consent Decree referenced in Section B.5 – Facility Wide Terms and Conditions.

c) Operational Restrictions

(1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart DD, including the following sections:

63.689(b) of Subpart DD and 63.962 of Subpart RR	standards and specifications for transfer and individual drain systems
63.689(c)(2)	standards and specifications for transfer systems consisting of continuous hard-piping

(2) Emissions from these emissions units shall be controlled by using continuous hard-piping. All joints or seams between the pipe sections shall be permanently or semi-permanently sealed.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable inspection, monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DD, including the following:

63.689(b) of Subpart DD and 63.964 of Subpart RR	inspection and monitoring of transfer and individual drain systems
63.689(b) of Subpart DD, and 63.965(a) of Subpart RR	recordkeeping requirements for transfer and individual drain systems

(2) The permittee shall perform a visual inspection of the wastewater transfer lines for defects that could result in liquid leaks on the wastewater transfer lines at least once a day on days of operation. In accordance with the Consent Decree, the inspections shall be performed at least once per day on days of operations. Repair all detected liquid leaks shall be completed as follows:

a. The permittee shall make first efforts at repair of the liquid leak no later than 5 days after detection, and repair shall be completed as soon as possible but no later than 45 days after detection except that repair of a defect may be delayed beyond 45 days if CWL determines that repair of the defect requires emptying or temporary removal from service of the transfer system and no alternative transfer system capacity is available at the site to accept the regulated material normally managed in the transfer system. CWL shall repair the defect the next time the process or unit that is generating the material handled by the transfer system stops operation.

b. Repairs of liquid leaks, dates of inspections, and corrective actions taken to repair liquid leaks shall be recorded by the permittee. Inspection and corrective action records shall be maintained at the facility, including

i. the date of inspection,

ii. the location of the liquid leak,

iii. a description of the liquid leak,

iv. the date of detection, and

v. the corrective action taken to repair the liquid leak.

In the event that repair of the defect is delayed in accordance with this provision, the permittee shall also record the reason for the delay and the date that completion of repair of the defect is expected. Records of these inspections shall be kept on site, available for review, for a period of 5 years.

(3) The permittee shall perform a visual inspection of the all containment areas for liquid leaks of off-site materials from tanks and transfer systems located within the containment areas. In accordance with the Consent Decree, the inspections shall be performed at least once per day on days of operation. Repairs must be made as soon as possible, and recordkeeping of the daily inspections and repairs shall be done, in accordance with the procedures identified in the "CONTAINMENT AREAS" Standard Operating Procedure manual (Rev 1, 6/10 or the most recent acceptable update of this plan) contained in Appendix C of the Consent Decree. These records must be retained at the facility for a minimum of three years.

e) Reporting Requirements

(1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart DD, per the following sections.

63.697(a)(1) of Subpart DD and 63.9 of 40 CFR Part 63 Subpart A	notification requirements
63.697(a)(2) of Subpart DD and 63.10 of 40 CFR Part 63 Subpart A	reporting requirements

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) This PTI supersedes PTI 08-04938 issued 03/02/2009 for these emissions units.