State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

01/30/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

03-62-01-0118
Ottawa County Landfill
Patrick Nortz
43502 Oberlin-Elyria Rd.
Oberlin, OH 44074

Dear Patrick Nortz:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **01/30/02**	Effective Date: **01/30/02**	Expiration Date: **01/30/07**

This document constitutes issuance of a Title V permit for Facility ID: 03-62-01-0118 to:
Ottawa County Landfill
530 North Camp Road
Port Clinton, OH 43452

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

F002 (Roadways and Parking Areas) Fugitive dust from plant roadways and parking areas.	P901 (MSW Landfill and Open Flare) MSW landfill with open flare and uncollected landfill gas emissions.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. 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 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:

i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., 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.) See B.8 below if no deviations occurred during the quarter.
iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to

the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. 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.

iv. 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.

2. 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 appropriate Ohio EPA District Office or local air 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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, 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, reopening 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.

7. 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.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b. 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:

   i. 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.

ii. 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 paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but

excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or

pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air 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 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 appropriate Ohio EPA District Office or local air 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 quarterly, i.e., 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.)

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. There are no storage piles at this facility and this permit does not authorize the permittee to establish and maintain storage piles at this facility.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z001 - diesel fuel dispensing facility;
Z002 - portable pumps;
Z003 - sludge solidification facility; and
Z004 - clay mining facility.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitation and/or control requirements contained within a permit to install for the emissions unit.

2. The permittee shall not cause or allow any open burning in violation of OAC Chapter 3745-19 at this facility.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Roadways and Parking Areas (F002)

Activity Description: Fugitive dust from plant roadways and parking areas.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
unpaved roadway and parking area	OAC rule 3745-17-08(B)	none (See Section A.I.2.a.)
	OAC rule 3745-17-07(B)(1)	none (See Section A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI 03-3123)	43.21 tons per year (TPY) of particulate emissions (PE) and 9.51 TPY of particulate matter less than 10 microns (PM-10) [from the paved and unpaved roadways and parking areas, combined] There shall be no visible particulate emissions (VE), except for 3 minutes during any 60-minute period best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See Sections A.I.2.c. and A.I.2.f. through A.I.2.k.)
paved roadways and parking areas	OAC rule 3745-17-08(B)	none (See Section A.I.2.a.)
	OAC rule 3745-17-07(B)(1)	none (See Section A.I.2.b.)
	OAC rule 3745-31-05 (PTI 03-3123)	There shall be no visible particulate emissions, except for 1 minute during any 60-minute period. best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (See Sections A.I.2.d. and A.I.2.f. through A.I.2.k.)

2. Additional Terms and Conditions

2.a The Ottawa County Landfill is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

2. Additional Terms and Conditions (continued)

2.b This emissions unit is exempt from the VE limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

2.c The unpaved roadways and parking areas that are subject to the terms and conditions of this permit are listed below:

unpaved roadways:

gravel interior roadway

unpaved parking areas:

employee parking area

2.d The paved roadways that are subject to the terms and conditions of this permit are listed below:

paved roadways:

entrance roadway

paved parking areas:

none

2.e The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas with water and sweeping, at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.f The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water and other suitable dust suppressants, at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.g The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area(s) that is (are) covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

2.h Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

2.i The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

2.j Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

2.k Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and each parking area in accordance with the following frequencies:

paved roadways and parking areas -
all

minimum inspection frequency-
twice daily (and not less than 4 hours apart) during operation

unpaved roadways and parking areas-
all

minimum inspection frequency -
twice daily (and not less than 4 hours apart) during operation

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

3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

4. The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 'd' shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit (paragraph A.1.c.ii).

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

a. Visible Emissions Limitations:
There shall be no VE, except for 1 minute during any 60-minute period (paved).
There shall be no VE, except for 3 minutes during any 60-minute period (unpaved).

Applicable Compliance Method:
Compliance with the visible emissions limitations for the paved and unpaved roadways and parking areas shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,") as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

b. Emission Limitations:
43.21 TPY of PE
9.51 TPY of PM-10

Applicable Compliance Method:
Compliance may be determined as follows:

i. multiply the emission factor {for PE and PM-10 based on pounds per vehicle mile traveled (VMT)} for paved roadways [from equation 1 in Chapter 13.2.1 of AP-42, Compilation of Air Pollution of Air Pollution Emission Factors, Volume I: Stationary Point and Area Sources; Fifth Edition, (updated 10/97)] by the maximum annual VMT, and then multiply by a control factor of (1-.90);*

ii. multiply the emission factor {for PE and PM-10 based on pounds per VMT} for unpaved roadways [from equation 1 in Chapter 13.2.2 of AP-42, Compilation of Air Pollution of Air Pollution Emission Factors, Volume I: Stationary Point and Area Sources; Fifth Edition, (updated 9/98)] by the maximum annual VMT, and then multiply by a control factor of (1-.90);** and

iii. add b.i. and b.ii. and divide by 2000.

* The control efficiency of applying water and sweeping is assumed to be 90%.

** The control efficiency of applying water and other suitable dust suppressants is assumed to be 90%

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: MSW Landfill and Open Flare (P901)

Activity Description: MSW landfill with open flare and uncollected landfill gas emissions.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
solid waste and asbestos landfill equipped with an active gas collection and control system (open flare)(as a backup control system)	OAC rule 3745-17-08(B)	none (See Section A.I.2.a.)
	OAC rule 3745-17-07(B)(1)	none (See Section A.I.2.b.)
	OAC Chapter 3745-76	See Sections A.I.2.c through A.I.2.m below.
	40 CFR Part 61, Subpart M	There shall be no visible emissions from asbestos-containing materials (ACM) during on-site transportation, transfer, unloading, deposition or compacting operations. See Sections A.I.2.n through A.I.2.s below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(A)(3) (PTI # 03-3213)	fugitive landfill emissions (emissions not captured by the collection and control system): 11.06 TPY of non-methane organic compounds (NMOC) 2024 TPY of methane (CH4) 7.80 TPY of particulate emissions (PE) controlled emissions from the flare: 0.263 lb of NMOC/hr*, 1.15 TPY of NMOC 48.19 lbs of CH4/hr*, 211.1 TPY of CH4 1.14 lbs of PE/hr*, 4.99 TPY of PE 0.237 lb of sulfur dioxide (SO2)/hr*, 1.04 TPY of SO2 5.186 lbs of nitrogen oxides (NOx)/hr*, 22.71 TPY of NOx 20.74 lbs of carbon monoxide (CO)/hr*, 90.84 TPY of CO 0.42 lb of hydrogen chloride (HCl)/hr*, 1.84 TPY of HCl * See A.I.2.y below. Visible fugitive particulate emissions shall not exceed 20% opacity, as a 3-minute average. best available control measures, as defined in the "Additional Terms and Conditions" section, to minimize or eliminate the emissions of fugitive dust (See Sections A.I.2.t through A.I.2.x below.)

2. Additional Terms and Conditions

2.a This facility is not located within the areas identified in "Appendix A" of OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

2.b This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

2.c The permittee's MSW landfill, which has a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, transfers all of the generated off-gases to Biogas Tech. (Bio Energy (Ohio)) to generate electricity by means of reciprocating internal combustion engines. In addition, the permittee already installed an open flare, which will be used as a backup control system.

2. Additional Terms and Conditions (continued)

2.d Since the calculated NMOC emission rate for this facility is greater than 50 Mg/yr, the permittee has installed a collection and control system that captures the gas generated within the landfill as required below.

i. An active collection system shall:

(a) be designed to handle the maximum expected gas flow rate from the entire area of the landfill that warrants control over the intended use period of the gas control or treatment system equipment;

(b) collect gas from each area, cell, or group of cells in the landfill in which the initial solid waste has been placed for a period of 5 years or more if active; or 2 years or more if closed or at final grade;

(c) collect gas at a sufficient extraction rate; and

(d) be designed to minimize off-site migration of subsurface gas.

ii. A passive collection system shall:

(a) comply with the provisions specified in Section A.I.2.d.i.; and

(b) be installed with liners on the bottom and all sides in all areas in which gas is to be collected. The liners shall be installed as required under 40 CFR 258.40.

2.e The permittee shall route all the collected gas to a control system that complies with the requirements in Section A.I.2.e.i or A.I.2.e.ii:

i. An open flare shall be designed and operated in accordance with the general control device requirements in 40 CFR 60.18:

(a) Flare shall be designed and operated with no visible particulate emissions as determined by the Method 22 of Appendix A of 40 CFR, Part 60, except for a periods not to exceed a total of 5 minutes during any 2 consecutive hours.

(b) Flare shall be operated with a flame present at all times. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of flame.

(c) The permittee has the choice of adhering to either the heat content specifications in Section A.I.2.e.i.(d) of this section and the maximum tip velocity specifications in Section A.I.2.e.i.(e) of this section, or adhering to the requirements in Section A.I.2.e.i.(f) of this section.

(d) The net heating value of the gas being combusted in a flare shall be calculated using the following equation:

Ht = K x (summation of i from 1 to n for CiHi)

where: K = constant, 1.740 x 10^-7 [(1/ppm)(g mole/scm)(MJ/Kcal)] where the standard temperature for (g mole/scm) is 20 degree Celsius;
Ht = Net heating value of the sample, MJ/scm; where the net enthalpy per mole of off gas is based on combustion at 25 degree Celsius and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20 degree Celsius;
Ci = Concentration of sample component i in ppm on a wet basis, as measured for organics by Reference Method 18 and measured for hydrogen and carbon monoxide by ASTM D1946-77 (Incorporated by reference as specified in Sec. 60.17); and
Hi = Net heat of combustion of sample component i, kcal/g mole at 25 degree Celsius and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 (incorporated by reference as specified in Sec. 60.17) if published values are not available or cannot be calculated.

2. Additional Terms and Conditions (continued)

(e) (i) Steam-assisted and nonassisted flares shall be designed for and operated with an exit velocity, as determined by dividing the volumetric flow rate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip, less than 18.3 m/sec (60 ft/sec), except as provided in (e)(ii) and (e)(iii) of this section.

(ii) Steam-assisted and nonassisted flares designed for and operated with an exit velocity, as determined by dividing the volumetric flow rate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip, equal to or greater than 18.3 m/sec (60 ft/sec) but less than 122 m/sec (400 ft/sec) are allowed if the net heating value of the gas being combusted is greater than 37.3 MJ/scm (1,000 Btu/scf).

(iii) Steam-assisted and nonassisted flares designed for and operated with an exit velocity, as determined by dividing the volumetric flow rate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip, less than the velocity, Vmax, as determined by the equation below, and less than 122 m/sec (400 ft/sec) are allowed.

$$\text{Log10 (Vmax)} = (Ht + 28.8)/31.7$$

Where: Vmax = Maximum permitted velocity, M/sec
28.8 = Constant
31.7 = Constant
Ht = The net heating value as determined in paragraph (d) above.

(f) Flare shall be used that have a diameter of 3 inches or greater, are nonassisted, have a hydrogen content of 8.0 percent (by volume), or greater, and are designed for and operated with an exit velocity less than 37.2 m/sec (122 ft/sec) and less than the velocity, Vmax, as determined by the following equation:

$$Vmax = (XH2 - K1) * K2$$

Where:
Vmax = Maximum permitted velocity, m/sec.
K1 = Constant, 6.0 volume-percent hydrogen.
K2 = Constant, 3.9(m/sec)/volume-percent hydrogen.
XH2 = The volume-percent of hydrogen, on a wet basis, as calculated by using the American Society for Testing and Materials (ASTM) Method D1946-77. (Incorporated by reference as specified in Sec. 60.17).

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

ii. The control system shall be designed and operated to reduce NMOC by 98 weight-percent, or, when an enclosed combustion device is used for control, to either reduce NMOC by 98 weight-percent or reduce the outlet NMOC concentration to less than 20 parts per million (ppm) by volume, dry basis as hexane at 3 percent oxygen. The reduction efficiency or ppm by volume shall be established by an initial performance test to be completed no later than 180 days after the initial startup of the approved control system using the test methods specified in OAC rule 3745-76-09(D).

2.f If the permittee seeks to demonstrate compliance with Section A.I.2.d.i.(d) through the use of a collection system not conforming to the specifications provided in Sections A.I.2.k through A.I.2.m, the permittee shall provide information satisfactory to the Director to demonstrate that off-site migration is being controlled.

2.g The permittee shall place each well or design component as specified in the approved design plan. Each well shall be installed no later than 60 days after the date on which the initial solid waste has been in place for a period of 5 years or more if active; or 2 years or more if closed or at final grade.

2. Additional Terms and Conditions (continued)

2.h For compliance with the surface methane operational standard as provided in Section A.II.3, any reading of 500 ppm or more above background at any location shall be recorded as a monitored exceedance and the actions specified in Sections A.I.2.h.i through A.I.2.h.v shall be taken. As long as the specified actions are taken, the exceedance is not a violation of the operational requirements of Section A.II.3.

i. The location of each monitored exceedance shall be marked and the location recorded.

ii. Cover maintenance or adjustments to the vacuum of the adjacent wells to increase the gas collection in the vicinity of each exceedance shall be made and the location shall be re-monitored within 10 calendar days of detecting the exceedance.

iii. If the re-monitoring of the location shows a second exceedance, additional corrective action shall be taken and monitored again within 10 days of the second exceedance. If the re-monitoring shows a third exceedance for the same location, the action specified in Section A.I.2.h.v shall be taken, and no further monitoring of that location is required until the action specified in Section A.I.2.h.v has been taken.

iv. Any location that initially showed an exceedance but has a methane concentration less than 500 ppm methane above background at the 10-day re-monitoring specified in Section A.I.2.h.ii or A.I.2.h.iii shall be re-monitored 1 month from the initial exceedance. If the 1-month remonitoring shows a concentration less than 500 ppm above background, no further monitoring of that location is required until the next quarterly monitoring period. If the 1-month remonitoring shows an exceedance, the actions specified in Section A.I.2.h.iii or A.I.2.h.v shall be taken.

v. For any location where the monitored methane concentration equals or exceeds 500 ppm above background three times within a quarterly period, a new well or other collection device shall be installed within 120 calendar days of the initial exceedance.

2.i For compliance with the surface methane operational standard as provided in Section A.II.3, the permittee shall implement a program to monitor for cover integrity and implement cover repairs as necessary on a monthly basis.

2.j The provisions of this permit under the authority of 40 CFR Part 60, Subpart WWW apply at all times, except during periods of start-up, shutdown, or malfunction, provided that the duration of start-up, shutdown, or malfunction shall not exceed 5 days for collection systems and shall not exceed 1 hour for treatment or control devices.

2.k The permittee shall site active collection wells, horizontal collectors, surface collectors, or other extraction devices at a sufficient density throughout all gas producing areas using the following procedures unless alternative procedures have been approved by the Administrator:

i. The collection devices within the interior and along the perimeter areas shall be certified to achieve comprehensive control of surface gas emissions by a professional engineer. The following issues shall be addressed in the design: depths of refuse, refuse gas generation rates and flow characteristics, cover properties, gas system expandibility, leachate and condensate management, accessibility, compatibility with filling operations, integration with closure end use, air intrusion control, corrosion resistance, fill settlement, and resistance to the refuse decomposition heat.

ii. The sufficient density of gas collection devices determined in Section A.I.2.k.i shall address landfill gas migration issues and augmentation of the collection system through the use of active or passive systems at the landfill perimeter or exterior.

2. Additional Terms and Conditions (continued)

2.l The placement of gas collection devices shall control all gas producing areas, except as provided by i and ii below:

i. Any segregated area of asbestos or non-degradable material may be excluded from collection if documented as provided under Section A.III.12. The documentation shall provide the nature, date of deposition, location and amount of asbestos or non-degradable material deposited in the area, and shall be provided to the Administrator and Director upon request.

ii. Any non-productive area of the landfill may be excluded from control, provided that the total of all excluded areas can be shown to contribute less than 1 percent of the total amount of NMOC emissions from the landfill. The amount, location, and age of the material shall be documented and provided to the Administrator and Director upon request. A separate NMOC emissions estimate shall be made for each section proposed for exclusion, and the sum of all such sections shall be compared to the NMOC emissions estimate for the entire landfill.

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

Qi = 2 x k x Lo x Mi x (e^(-kti) x (Cnmoc) x (3.6 x 10^(-9))

where:
Qi = NMOC emission rate from the i th section, in megagrams per year
k = methane generation rate constant, in year ^(-1)
Lo = methane generation potential, in cubic meters per megagram solid waste
Mi = mass of the degradable solid waste in the i th section, in megagram
ti = age of the solid waste in the i th section, in years
Cnmoc = concentration of nonmethane organic compounds, in parts per million by volume
3.6 x 10^(-9) = conversion factor

iii. The values for k, Lo, and Cnmoc determined in field testing shall be used, if field testing has been performed in determining the NMOC emission rate or the radii of influence. If field testing has not been performed, the default values for k, Lo and Cnmoc are provided below:

k* = 0.05 per year
Lo = 170 cubic meters per megagram
Cnmoc = 4,000 parts per million by volume as hexane

* For landfills located in geographical areas with a 30-year annual average precipitation of less than 25 inches, as measured at the nearest representative official meteorologic site, the k value to be used is 0.02 per year.

2. Additional Terms and Conditions (continued)

2.m When the permittee constructs new gas collection devices, the permittee shall use the following equipment or procedures:

i. The landfill gas extraction components shall be constructed of polyvinyl chloride (PVC), high density polyethylene (HDPE) pipe, fiberglass, stainless steel, or other nonporous corrosion resistant material of suitable dimensions to: convey projected amounts of gases; withstand installation, static, and settlement forces; and withstand planned overburden or traffic loads. The collection system shall extend as necessary to comply with emission and migration standards. Collection devices such as wells and horizontal collectors shall be perforated to allow gas entry without head loss sufficient to impair performance across the intended extent of control. Perforations shall be situated with regard to the need to prevent excessive air infiltration.

ii. Vertical wells shall be placed so as not to endanger underlying liners and shall address the occurrence of water within the landfill. Holes and trenches constructed for piped wells and horizontal collectors shall be of sufficient cross-section so as to allow for their proper construction and completion including, for example, centering of pipes and placement of gravel backfill. Collection devices shall be designed so as not to allow indirect short circuiting of air into the cover or refuse into the collection system or gas into the air. Any gravel used around pipe perforations should be of a dimension so as not to penetrate or block perforations.

iii. Collection devices may be connected to the collection header pipes below or above the landfill surface. The connector assembly shall include a positive closing throttle valve, any necessary seals and couplings, access couplings and at least one sampling port. The collection devices shall be constructed of PVC, HDPE, fiberglass, stainless steel, or other nonporous material of suitable thickness.

2.n There shall be no visible emissions from asbestos-containing materials (ACM) during on-site transportation, transfer, unloading, deposition or compacting operations.

2.o The permittee shall inspect each load of ACM delivered to the facility. The inspection shall consist of a visual examination to ensure that each shipment of ACM is received in intact, leak-tight containers labeled with appropriate hazard warning labels, the name of the waste generator, and the location of waste generation. The inspection also shall determine whether the waste shipment records accompany the consignment and accurately describe the waste material and quantity.

If on the basis of the inspection, the waste material is found to be improperly received, the load shall be disposed of in accordance with the procedures in the "Asbestos Spill Contingency Plan," and the discrepancy shall be noted on the waste shipment record.

2.p Deposition and burial operations shall be conducted in a careful manner that prevents asbestos-containing waste materials from being broken up or dispersed before the materials are buried.

2.q The permittee shall cover and compact asbestos wastes in accordance with the following:

i. As soon as practicable after the placement of friable asbestos, but no later than the end of each working day, the asbestos-containing waste materials deposited at the site during the operating day shall be covered with at least 12 inches of non-ACM. Once the ACM are covered, the area may be compacted.

ii. Care shall be taken to ensure that disposed asbestos shall not be re-excavated in subsequent operations. Any accidentally exposed material shall be immediately recovered in accordance with the provisions of condition i above.

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

2.r The permittee shall implement and maintain an "Asbestos Disposal Operating Procedure and Spill Contingency Plan" ("Plan") consisting of: authorized personnel training, inspection and disposal operating procedures, non-conforming load response procedures, inventory and maintenance procedures for safety and emissions control equipment, record keeping procedures, and emergency notification procedures. Authorized personnel shall be knowledgeable in the procedures, and the Plan shall be available for inspection at this facility at all times.

2. Additional Terms and Conditions (continued)

2.s Emissions control equipment shall be available for wetting and containing asbestos in the event of a release or non-conforming load disposal. All equipment required to implement the Plan shall be maintained in accordance with good engineering practices to ensure that the equipment is in a ready-to-use condition and in an appropriate location for use.

2.t The permittee shall employ best available control measures on all cell load-in operations associated with the landfill cell for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the cell load-in operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.u The above-mentioned control measures shall be employed for each cell load-in operation of the landfill cell if the permittee determines, as a result of the inspections conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.

2.v The permittee shall employ best available control measures on all surface working operations associated with the landfill cell for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the surface working operations with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.w The permittee shall employ best available control measures for wind erosion from surfaces associated with the landfill cell for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the landfill surface with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.x The above-mentioned control measures shall be employed for surface operations and wind erosion from the landfill cell if the permittee determines, as a result of the inspections conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures shall not be necessary for the landfill cell that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

2.y *The hourly emission limitations are established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, no record keeping, monitoring and/or reporting requirements are necessary to ensure compliance with these limitations.

II. Operational Restrictions

1. The permittee of an MSW landfill with a gas collection and control system used to comply with the provisions of Section A.I.2.d shall operate the collection system with negative pressure at each wellhead except under the following conditions:

a. A fire or increased well temperature. (The permittee shall record instances when positive pressure occurs in efforts to avoid a fire. These records shall be submitted with the annual reports as provided in Section A.IV.2.)

b. Use of a geomembrane or synthetic cover. (The permittee shall develop acceptable pressure limits in the design plan.)

c. A decommissioned well. (A well may experience a static positive pressure after shut down to accommodate for declining flows. All design changes shall be approved by the Director.)

II. Operational Restrictions (continued)

2. The permittee shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55 degrees Celsius and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The permittee may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.

2.a The nitrogen level shall be determined using 40 CFR Part 60, Appendix A, Method 3C, unless an alternative test method is approved by the Administrator.

2.b The oxygen level shall be determined by an oxygen meter using 40 CFR Part 60, Appendix A, Method 3A, unless an alternative test method is approved by the Administrator, except that:

i. The span shall be set so that the regulatory limit is between 20 and 50 percent of the span.

ii. A data recorder is not required.

iii. Only two calibration gases are required, a zero and span, and ambient air may be used as the span.

iv. A calibration error check is not required.

v. The allowable sample bias, zero drift, and calibration drift are plus or minus 10 percent.

3. The permittee shall operate the collection system so that the methane concentration is less than 500 parts per million above background at the surface of the landfill. To determine if this level is exceeded, the permittee shall conduct surface testing on a quarterly basis around the perimeter of the collection area and along a pattern that traverses the landfill at 30-meter intervals and where visual observations indicate elevated concentrations of landfill gas, such as distressed vegetation and cracks or seeps in the cover. The permittee may establish an alternative traversing pattern that ensures equivalent coverage. A surface monitoring design plan shall be developed that includes a topographical map with the monitoring route and the rationale for any site-specific deviations from the 30-meter intervals. Areas with steep slopes or other dangerous areas may be excluded from the surface testing.

4. The permittee shall operate the gas collection and control system such that all collected gases are vented to a control system designed and operated in compliance with Section A.I.2.e. In the event the collection or control system is inoperable, the gas mover system shall be shut down and all valves in the collection and control system contributing to venting of the gas to the atmosphere shall be closed within 1 hour.

5. The permittee shall operate the control or treatment system at all times when the collected gas is routed to the system.

6. If monitoring demonstrates that the operational requirements in Sections A.II.1 through A.II.3 are not met, corrective action shall be taken as specified in Sections A.III.1, A.III.2, A.I.2.h, and/or A.I.2.i. If corrective actions are taken as specified, the monitored exceedance is not a violation of the operational requirements.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall install a sampling port and a thermometer or other temperature measuring device, or an access port for temperature measurements at each wellhead.

a. For the purpose of demonstrating whether the gas collection system flow rate is sufficient to determine compliance with Section A.I.2.d.i.(c), the permittee shall measure gauge pressure in the gas collection header at each individual well, monthly. If a positive pressure exists, action shall be initiated to correct the exceedance within 5 calendar days, except for the three conditions allowed under Section A.II.1. If negative pressure cannot be achieved without excess air infiltration within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial measurement of positive pressure. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Director for approval.

b. For the purpose of identifying whether excess air infiltration into the landfill is occurring, the permittee shall monitor each well monthly for temperature and nitrogen or oxygen as provided in Section A.II.2. If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Director for approval.

2. The permittee shall monitor surface concentrations of methane along the entire perimeter of the collection area and along a pattern that traverses the landfill at 30-meter intervals (or a site-specific established spacing) for each collection area on a quarterly basis using an organic vapor analyzer, flame ionization detector, or other portable monitor meeting the specifications provided in below:

a. The background concentration shall be determined by moving the probe inlet upwind and downwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells.

b. Surface emission monitoring shall be performed in accordance with section 4.3.1 of Method 21 of Appendix A of 40 CFR Part 60, except that the probe inlet shall be placed within 5 to 10 centimeters of the ground. Monitoring shall be performed during typical meteorological conditions.

c. The portable analyzer shall meet the instrument specifications provided in section 3 of Method 21 of Appendix A of 40 CFR Part 60, except that "methane" shall replace all references to VOC.

d. The calibration gas shall be methane, diluted to a nominal concentration of 500 parts per million in air.

e. To meet the performance evaluation requirements in section 3.1.3 of Method 21 of Appendix A of 40 CFR Part 60, the instrument evaluation procedures of section 4.4 of Method 21 of Appendix A of 40 CFR Part 60 shall be used.

f. The calibration procedures provided in section 4.2 of Method 21 of Appendix A of 40 CFR Part 60 shall be followed immediately before commencing a surface monitoring survey.

3. The permittee using an open flare shall calibrate, maintain, and operate according to the manufacturer's specifications the following equipment:

a. A heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame.

b. A device that records flow to or bypass of the flare. The permittee shall either:

i. calibrate, and maintain a gas flow rate measuring device that shall record the flow to the control device at least every 15 minutes; or

ii. secure the bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall monitor surface concentrations of methane according to the instrument specifications and procedures provided in this permit. Any closed landfill that has no monitored exceedances of the operational standard in three consecutive quarterly monitoring periods may skip to annual monitoring. Any methane reading of 500 ppm or more above background detected during the annual monitoring returns the frequency for that landfill to quarterly monitoring.

5. The permittee shall keep for at least 5 years up-to-date, readily accessible, on-site records of the design capacity report which includes: the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. Either paper copy or electronic formats are acceptable. These records may be also required by the OEPA, Division of Solid and Infectious Waste Management, and shall satisfy this permit condition.

6. The permittee shall keep up-to-date, readily accessible records for the life of the control equipment of the data listed below as measured during the initial performance test or compliance determination. Records of subsequent tests or monitoring shall be maintained for a minimum of 5 years. Records of the control device vendor specifications shall be maintained until removal:

a. The maximum expected gas generation flow rate as calculated.

b. The density of wells, horizontal collectors, surface collectors, or other gas extraction devices determined.

c. Where the permittee seeks to demonstrate compliance with Section A.I.2.e.i through use of an open flare, the flare type (i.e., steam-assisted, air-assisted, or nonassisted), all visible emissions readings, heat content determinations, flow rate or bypass flow rate measurements, and exit velocity determinations made during the performance test as specified in 40 CFR 60.18; continuous records of the flare pilot flame or flare flame monitoring and records of all periods of operations during which the pilot flame of the flare flame is absent.

7. The permittee of a controlled landfill subject to the provisions of this subpart shall keep for 5 years up-to-date, readily accessible continuous records of the equipment operating parameters specified to be monitored in Sections A.III.1 through A.III.3 as well as up-to-date, readily accessible records for periods of operation during which the parameter boundaries established during the most recent performance test are exceeded.

8. The permittee shall keep up-to-date, readily accessible continuous records of the indication of flow to the control device or the indication of bypass flow or records of monthly inspections of car-seals or lock-and-key configurations used to seal bypass lines, specified under Sections A.III.1 through A.III.3.

9. The permittee shall keep up-to-date, readily accessible continuous records of the flame or flare pilot flame monitoring specified under Section A.III.3, and up-to-date, readily accessible records of all periods of operation in which the flame or flare pilot flame is absent.

10. The permittee shall keep for the life of the collection system an up-to-date, readily accessible plot map showing each existing and planned collector in the system and providing a unique identification location label for each collector.

11. The permittee shall keep up-to-date, readily accessible records of the installation date and location of all newly installed collectors as specified under Section A.I.2.g.

12. The permittee shall keep readily accessible documentation of the nature, date of deposition, amount, and location of asbestos-containing or nondegradable waste excluded from collection as provided in Section A.I.2.l.i as well as any nonproductive areas excluded from collection as provided in Section A.I.2.l.ii.

13. The permittee shall keep for at least 5 years up-to-date, readily accessible records of all collection and control system exceedances of the operational standards in Sections A.II.1 through A.II.6, the reading in the subsequent month whether or not the second reading is an exceedance, and the location of each exceedance.

14. Except as otherwise provided in this section, the permittee shall perform inspections of the landfill operation areas in accordance with the following frequencies:

landfill areas	minimum inspection frequency
all landfill areas	twice daily (and not less than 4 hours apart) during operation

III. Monitoring and/or Record Keeping Requirements (continued)

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

16. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequency if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

17. The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in Section A.III.17.d. shall be kept separately for (i) the solid waste load-in operations, (ii) the surface working operations, and (iii) the cell surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

18. The permittee shall maintain records of the following information:

a. The waste shipment record form for each shipment of ACM.

b. The location, depth and area, and quantity in cubic yards of all ACM within the disposal site, on a map or diagram of the disposal area.

III. Monitoring and/or Record Keeping Requirements (continued)

19. The permittee shall require that all asbestos waste shipments received be accompanied by a waste shipment record. The waste shipment records shall include the following information:

a. The name of the work site or facility where the asbestos-containing waste was generated and the mailing address and telephone number of the facility owner.

b. The name, mailing address and telephone number of the owner or operator (waste generator) responsible for handling, packing, marking, and labeling the asbestos-containing waste material.

c. The name, mailing address, telephone number and site location of the active waste disposal site designated by the generator to receive the asbestos-containing waste material for disposal.

d. The name and address of the local, state or USEPA regional agency responsible for administering the asbestos NESHAP program.

e. A description of the asbestos-containing waste materials included in the waste shipment.

f. The number and type of containers included in the waste shipment.

g. The approximate volume of asbestos-containing waste material included in the waste shipment in cubic yards.

h. Special handling instructions or additional information relative to the waste shipment the waste generator may specify.

i. A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

j. The name, address and phone number of the transporter.

k. A signature by the transporter to acknowledge receipt of the asbestos-containing waste shipment described by the waste generator in Sections A.III.19.a through A.III.19.j.

l. A discrepancy indication space to be completed by the transporter or waste shipment owner or operator if any improperly contained asbestos waste is observed or if there is any discrepancy in the quantity of asbestos shipped and the quantity of asbestos waste received at the asbestos waste disposal site. Significant amounts of improperly contained waste shall be reported in writing to the Ohio EPA by the following working day. The report shall include a copy of the waste shipment.

m. The name and telephone number of the disposal site operator.

n. A signature by the waste disposal site operator to acknowledge receipt of the asbestos-containing waste shipment described by the waste generator in Sections A.III.19.a through A.III.19.m, except as noted in the discrepancy indication space.

o. The date of receipt.

The waste shipment record forms shall be retained at the facility for at least 2 years, and shall be made available for inspection upon request.

IV. Reporting Requirements

1. The permittee shall submit a closure report to the Administrator within 30 days of waste acceptance cessation. The Administrator or Director may request additional information as may be necessary to verify that permanent closure has taken place in accordance with the requirements of 40 CFR 258.60. If a closure report has been submitted to the Administrator and Director, no additional wastes may be placed into the landfill without filing a notification of modification. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted. This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator or Director may request additional relevant information subsequent to this notice.

2. The permittee shall submit to the Director annual reports of the recorded information in Sections A.IV.2.a through A.IV.2.f. For flares, reportable exceedances are defined under Section A.III.g. The report shall be submitted by January 31 of each year and shall cover the previous calendar year.

2.a Value and length of time for each exceedance of the applicable parameters monitored under Section A.III.1.

2.b Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under Section A.III.3.

2.c Description and duration of all periods when the control device was not operating for a period exceeding 1 hour and length of time the control device was not operating.

2.d All periods when the collection system was not operating in excess of 5 days.

2.e The location of each exceedance of the 500 ppm methane concentration as provided in Section A.II.3 and the concentration recorded at each location for which an exceedance was recorded in the previous month.

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

3. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:

a. each day during which a fugitive dust inspection was not performed by the required frequency; and

b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

4. The permittee shall submit quarterly reports summarizing the asbestos disposal activities. The reports shall contain the following information:

a. The name, address and location of the facility, the calendar period covered by the report, and any changes in the methods of storage or the disposal operations.

b. A list of all asbestos-containing waste consignments received including: the date received, the name of the waste generator, the name and location of the facility where the load originated, the quantity of asbestos, and any discrepancy or non-conformity discovered.

These quarterly reports shall be submitted no later than January 31, April 30, July 31 and October 31 and shall cover the previous calendar quarters.

5. As soon as possible, but no later than 30 days after receipt of the asbestos waste, the permittee shall send a copy of the signed waste shipment record to the waste generator.

IV. Reporting Requirements (continued)

6. Upon discovering a discrepancy between the quantity of waste designated on a waste shipment record and the quantity actually received, the permittee shall attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the State, local, district, or USEPA regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, the appropriate Ohio EPA District Office or local air agency. Describe the discrepancy and attempts to reconcile it, and submit a copy of the waste shipment record along with the report.

7. The permittee shall submit, upon closure of the facility, a copy of the records of the asbestos waste disposal locations and quantities.

8. The permittee shall notify the appropriate Ohio EPA District Office or local air agency in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided at least 10 working days before excavation begins and in no event shall excavation being earlier than the date specified in the original notification. The following information shall be included in the notice:

a. Scheduled starting and completion dates.

b. Reason for disturbing the waste.

c. Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. (If deemed necessary, the Director may require changes in the proposed emission control procedures).

d. Location of any temporary storage site and the final disposal site.

9. The permittee shall notify the appropriate Ohio EPA District Office or local air agency of any load of ACM which is rejected, or any non-conforming load disposed of in accordance with the "Asbestos Spill Contingency Plan." Notification shall be provided as soon as possible by a phone contact, followed in writing by the next working day. The written notification shall provide a copy of the waste shipment record ("WSR"), if available, or when waste is not shipped with a WSR, provide available information concerning vehicle identification, source of the load, a description of the load, nature of discrepancy, and the location of disposal. If possible, non-conforming loads of suspect friable material shall be detained, or the location of disposal protected from damage, until the Ohio EPA is informed and provided the opportunity to inspect.

V. Testing Requirements

1. The permittee shall calculate the NMOC emission rate using the equation(s) provided in OAC rule 3745-76-09(A)(1). Both equations may be used if the actual year-to-year solid waste acceptance rate is known for part of the life of the landfill, and the actual year-to-year solid waste acceptance rate is unknown for part of the life of the landfill. The values to be used in both equations are as follows: 0.05 per year for k, 170 cubic meters per megagram for Lo, and 4,000 parts per million by volume as hexane for the Cnmoc. For landfills located in geographical areas with a 30-year annual average precipitation of less than 25 inches, as measured at the nearest representative official meteorologic site, the k value to be used is 0.02 per year.

When calculating emissions for PSD purposes, the permittee of each MSW landfill shall estimate the NMOC emission rate for comparison to the PSD major source and significance levels in 40 CFR 51.166 or 40 CFR 52.21 using AP-42 or other approved measurement procedures.

V. Testing Requirements (continued)

2.a Emission Limitation:
fugitive landfill gas (emissions not captured by the collection and control system) - 11.06 TPY of NMOC and 2024 TPY of Methane

Applicable Compliance Method:
The annual allowable emission limitations above represent the maximum potentials to emit for this emissions unit. Maximum potential emissions are predicted to occur in the year 2003 and are based on the following:

i. a maximum landfill capacity of 4.3 x 10^6 Mg; and

ii. a landfill gas collection system efficiency of 80% (based on engineering designs).

Compliance with annual allowable NMOC and Methane emission limitations above may be determined by using equation 1, AP-42, Chapter 2.4 (revised 11/98), a landfill capacity of 4.3 x 10^6 MG, and an assumed control system efficiency of 80%.

2.b Emission Limitation:
controlled emissions from flare (short-term): 0.263 lb of NMOC/hr

Applicable Compliance Method:
The permittee may determine compliance with the hourly allowable NMOC emission limitation by multiplying the maximum hourly NMOC flow rate to the flare (13.16 lbs of NMOC/hr)* by an assumed control factor of (1-0.98).**

* the hourly NMOC flow rate was calculated based on equation 2, AP-42, Chapter 2.4 (revised 11/98)
** the control efficiency of 80% was based on AP-42, Table 2.4-3, for flares

2.c Emission Limitation:
controlled emissions from flare (short-term): 48.19 lbs of CH4/hr

Applicable Compliance Method:
The permittee may determine compliance with the hourly allowable CH4 emission limitation by multiplying the maximum hourly CH4 flow rate to the flare (2409.37 lbs of CH4/hr)* by an assumed control factor of (1-0.98).**

* the hourly CH4 flow rate was calculated based on equation 1, AP-42, Chapter 2.4 (revised 11/98)
** the control efficiency of 98% was based on AP-42, Table 2.4-3 (revised 11/98) for flares

2.d Emission Limitation:
secondary emissions from flare (short-term): 1.14 lbs of PE/hr

Applicable Compliance Method:
Compliance with the hourly allowable PE limitation may be determined by multiplying the emission factor of 0.07 gr/scfm* by the maximum gas flow rate (dscfm) and by 60, and then dividing by 7,000.

* This emission factor was obtained from AP-42, Table 2.4-5 (revised 11/98).

2.e Emission Limitation:
secondary emissions from flare (short-term): 0.24 lb of SO2/hr

Applicable Compliance Method:
Compliance with the hourly allowable SO2 emission limitation may be determined by using the equation 7, AP-42, Table 2.4-5 (revised 11/98), the maximum sulfur concentration of 12.3 ppm, and the maximum gas flowrate to the flare of 300.42 lbmoles/hr.

V. Testing Requirements (continued)

2.f Emission Limitation:
secondary emissions from flare (short-term): 5.19 lbs of NOx/hr

Applicable Compliance Method:
Compliance with the hourly allowable NOx emission limitation may be determined by using the emission factor of 0.10 lb of NOx/mmBtu multiplied by the maximum heat input to the flare of 51.86 mmBtu/hr.

* Emission factor was based on the information supplied by the control equipment manufacturer.

2.g Emission Limitation:
secondary emissions from flare (short-term): 20.74 lbs of CO/hr

Applicable Compliance Method:
Compliance with the hourly allowable CO emission limitation may be determined by using the emission factor of 0.40 lb of CO/mmBtu multiplied by the maximum heat input to the flare of 51.86 mmBtu/hr.

* Emission factor was based on the information supplied by the control equipment manufacturer.

2.h Emission Limitation:
secondary emissions from flare (short-term): 0.42 lb of HCl/hr

Applicable Compliance Method:
Compliance may be determined in accordance with equation 10, from AP-42, Chapter 2.4 (revised 11/98).

2.i Emission Limitations:
controlled emissions from flare (long-term)

1.15 TPY of NMOC
211.1 TPY of CH4
4.99 TPY of PE
1.04 TPY of SO2
22.71 TPY of NOx
90.84 TPY of CO
1.84 TPY of HCl

Applicable Compliance Method:
The annual allowable emission limitations listed above were developed by multiplying the hourly allowable emission limitations by 8,760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitations, compliance shall also be shown with the annual limitations.

2.j Emission Limitation:
fugitive landfill particulate emissions: 7.80 TPY of PE

Applicable Compliance Method:
The annual allowable fugitive PE limitation listed above was developed by multiplying an assumed control factor of (1 - 0.9)* by a maximum potential uncontrolled PE rate of 78.0 TPY.

* control efficiency for dust suppression is assumed to be 90%

2.k Emission Limitation:
visible fugitive particulate emissions shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:
Commpliance shall be determined by test Method 9 as set forth in "Appendix A on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

V. Testing Requirements (continued)

2.l Emission Limitation:
There shall be no visible particulate emissions from the flare except for a periods not to exceed a total of 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:
If required, commpliance shall be determined by test Method 22 as set forth in "Appendix A on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

VI. Miscellaneous Requirements

1. Authority to Enter

Pursuant to the authority in OAC rule 3745-77-07(C)(2) or ORC section 3704.03(L), any representative of the Director may, upon presentation of proper identification, enter at any reasonable time upon any portion of the property where this landfill is located, including any improvements thereon, to make inspections, take samples, conduct tests and examine records or reports pertaining to any emissions of air contaminants and any monitoring equipment, emissions control equipment or methods. No operator or agent of this landfill shall act in any manner to refuse, hinder, or thwart this legal right of entry.

2. It is the understanding of Ohio EPA that Ottawa County Landfill has contracted with Bio-Gas Technologies, Inc. to install and operate 3 landfill gas-fired internal combustion engines rated at 12.617 mmBtu/hr, at the property to control the emissions of the landfill gases and produce electricity. Once the internal combustion engines are installed, the flare will act as a backup control system. In addition, Bio-Gas Technologies, Inc. will be required to meet all applicable requirements for control and destruction efficiencies listed in this permit. Also, Bio-Gas Technologies, Inc. shall expeditiously apply for a Title V permit.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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