Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

1/31/2011

Certified Mail

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

Steve Pantano
Stericycle Inc
1901 Pine Ave Se
Warren, OH 44483

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0278080634
Permit Number: P0107415
Permit Type: Initial Installation
County: Trumbull

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Warren Tribune Chronicle. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

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

Permit Strategy Write-Up

1. Check all that apply:

   ___ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   Stericycle, a Title V facility as a requirement of NSPS, owns and operates a hospital, medical, and infectious waste incineration (HMIWI) facility in Warren, Ohio. They are proposing to install a second HMIWI. Stericycle will use a custom control system, based on retrofitting of existing HMIWIs to meet new federal standards.

3. Facility Emissions and Attainment Status:

   Stericycle is located in Trumbull County, which is attainment for all pollutants. Since this is a new construction of an HMIWI, the Ohio standards, OAC 3745-75 do not apply. This new unit will be regulated by US EPA standards, 40 CFR, Part 60, Subpart Ec, which are more stringent than all Ohio EPA standards.

4. Source Emissions:

   40 CFR, Part 60, Subpart Ec regulates: PE, CO, dioxins/furans, HCl, SO2, NOx, lead, cadmium, mercury, VEs from the stack, and fugitive VEs. All limitations except for VEs are in mg/dscm or ppm. Emission for all pollutant except for NOx after controls will be less than 1 TPY. NOx PTE will be at 13.4 TPY, based on an allowable emission limit of 130 ppm in stack exhaust.

5. Conclusion:

   By meeting the requirements of 40 CFR, Part 60, Subpart Ec, Stericycle's new unit will have the lowest emissions of any HMIWI is the country. US EPA stated in their background document to 40 CFR, Part 60, Subpart Ec, that the allowable emission limits are based on a MACT floor of the lowest rates of all existing units.

6. Please provide additional notes or comments as necessary:

   Although OAC 3745-75 does not apply to this new unit, several requirements of that rule are in the permit for this new unit under OAC 3745-31-05(D). These standards are included because they are a part of Stericycles' standard operating procedures for this existing facility.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
NOX	13.4
CO, dioxins/furans, HCl, SO2, NOx, lead, cadmium, mercury	Less than 1

Trumbull County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Stericycle Inc

Issue Date:	1/31/2011
Permit Number:	P0107415
Permit Type:	Initial Installation
Permit Description:	Permit for a proposed additional large commercial Hospital, Medical, and Infectious Waste Incinerator (HMIWI) with Air Pollution Control System, and ancillary equipment to support its operations including a cooling tower
Facility ID:	0278080634
Facility Location:	Stericycle Inc 1901 Pine Avenue SE, Warren, OH 44483
Facility Description:	Solid Waste Combustors and Incinerators

Scott J. Nally, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Robert Goulish at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087 or (330)425-9171. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Stericycle Inc

Facility ID:	0278080634
Permit Number:	P0107415
Permit Type:	Initial Installation
Issued:	1/31/2011
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Stericycle Inc

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. N010, Incinerator 14
2. P003, CT 28

Authorization

Facility ID: 0278080634
Facility Description:
Application Number(s): A0039261
Permit Number: P0107415
Permit Description: Permit for a proposed additional large commercial Hospital, Medical, and Infectious Waste Incinerator (HMIWI) with Air Pollution Control System, and ancillary equipment to support its operations including a cooling tower
Permit Type: Initial Installation
Permit Fee: $1,200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 1/31/2011
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Stericycle Inc
1901 Pine Avenue SE
Warren, OH 44483

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

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0107415
Permit Description: Permit for a proposed additional large commercial Hospital, Medical, and Infectious Waste Incinerator (HMIWI) with Air Pollution Control System, and ancillary equipment to support its operations including a cooling tower

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

Emissions Unit ID:	**N010**
Company Equipment ID:	Incinerator
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	CT
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations,

excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall

submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All

records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

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

   a) None.

2. The permittee shall comply with the requirements contained within the most recent version of the following regulations that are applicable to the facility:

   a) 40 CFR Part 60, Subpart Ec – Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced After June 20, 1996. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA Northeast District Office.

C. Emissions Unit Terms and Conditions

1. N010, Incinerator

Operations, Property and/or Equipment Description:

Large Commercial Hospital, Medical, and Infectious Waste Incinerator (HMIWI) with Air Pollution Control System

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

None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart Ec	Particulate emissions (PE) shall not exceed 18 mg PE/dscm (0.0080 grain PE/dscf) of exhaust gases. Carbon monoxide (CO) emissions shall not exceed 11 parts per million (ppm) by volume as a 24-hour block average, calculated as specified in EPA Reference Method 19. Dioxins/furans (D/F) emissions shall not exceed 9.3 ng/dscm (4.1grains/billion dscf) of total dioxins/furans or 0.035 ng/dscm (0.015 grain/billion dscf) expressed as Toxic Equivalency Factors (TEQ). Hydrogen chloride (HCl) emissions shall not exceed 5.1 ppm by volume. Sulfur dioxide (SO2) emissions shall not exceed 1.6 ppm by volume. Nitrogen oxides (NOx) emissions shall not exceed 130 ppm by volume. Lead (Pb) emissions shall not exceed 0.00069 mg/dscm (0.00030 gr/1000 dscf).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Cadmium (Cd) emissions shall not exceed 0.00013 mg/dscm (0.000057 gr/1000 dscf). Mercury (Hg) emissions shall not exceed 0.0013 mg/dscm (0.00057 gr/1000 dscf). (all units corrected to 7% oxygen, dry basis at standard conditions) Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 6% opacity as a 6-minute block average. Visible particulate emissions of combustion ash from an ash conveying system, including transfer points, shall not exceed 5 percent of the observation period (i.e., 9 minutes per 3 hour period), as determined by 40 CFR Part 60, Appendix A, Method 22. See b)(2)a and b. (Table 1B to Subpart Ec of Part 60 – Emissions Limits for Small, Medium, and Large HMIWI at Affected Facilities as Defined in § 60.50c(a)(3) and (4))
b.	OAC rule 3745-17-07	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart Ec.
c.	OAC rule 3745-17-09	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart Ec.
d.	OAC rule 3745-31-05(A)(3)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to 40 CFR Part 60, Subpart Ec.
e.	OAC chapter 3745-75	Exempt per OAC rule 3745-75-01(C)(4).
f.	OAC rule 3745-31-05(D)	See c)(2), c)(4), c)(5), c)(6), c)(7), c)(8), c)(9), c)(10), c)(11), c)(12), d)(1), d)(2), d)(3), d)(4), e)(1), e)(2), and e)(5).

(2) Additional Terms and Conditions

a. The visible particulate emissions limit of combustion ash does cover visible emissions discharged to the atmosphere from buildings or enclosures of ash conveying systems. The visible particulate emissions limit does not cover visible emissions discharged inside buildings or enclosures of ash handling systems.

b. The visible particulate emissions limit of combustion ash does not apply during maintenance and repair of ash conveying systems. Maintenance and/or repair shall not exceed 10 operating days per calendar quarter unless the owner or operator obtains written approval from the Ohio EPA establishing a date whereby all necessary maintenance and repairs of ash conveying systems shall be completed.

c) Operational Restrictions

(1) The waste material feed rate to this incinerator shall be limited to 1500 pounds per hour (or a rate established during either the initial performance testing or most recent performance test as petitioned by the permittee).

(2) All incineration shall occur in a controlled air, multi-chamber incinerator, or equivalent technology, which provides complete combustion of waste, excluding non-combustible items, to carbonized or mineralized ash. Any ash that does not meet this criterion shall be reincinerated.

(3) The secondary combustion chamber for this incinerator shall operate so that the temperature of the gas exiting the chamber is a minimum of 90% of the highest 3-hour average secondary chamber temperature (taken, at a minimum, once every minute) measured during the initial performance test or the most recent performance test as petitioned by the permittee, demonstrating compliance with the PE, CO, NOx, and D/F emission limits.

(4) The secondary combustion chamber of this incinerator shall allow for a 2-second retention time.

(5) This incinerator shall be equipped with an automatic feeder which is designed and operated so that wastes cannot be charged if the temperature of the gas exiting the secondary combustion chamber has not reached the minimum temperature established in c)(3).

(6) The primary combustion chamber for this incinerator shall be maintained so that the exit gas is at a minimum temperature of 1400 degrees Fahrenheit. Infectious waste shall not be loaded into the primary combustion chamber of this incinerator until the exit gas temperature has reached 1400 degrees Fahrenheit.

(7) The stack(s) for this incinerator shall be designed to minimize the impact of the emissions on employees, visitors, and nearby residences. The design shall meet good engineering practices so as not to cause concentrations of any air contaminant at any air intake for heating and cooling of any building or at operable windows or doors.

(8) If this incinerator is mechanically-fed, it must be equipped with an air lock system to prevent opening the incinerator to the room environment. The volume of the loading system shall be designed so as to prevent the overcharging of the unit to ensure complete combustion of the waste.

(9) This incinerator, including all associated equipment and grounds, shall be designed, operated and maintained to prevent the emission of objectionable odors.

(10) Under no circumstances shall radiological or radioactive waste be charged into this unit.

Medical/infectious waste that is also radioactive shall be managed in accordance with the applicable rules of the Ohio department of health and regulations of the United States nuclear regulatory commission.

(11) This facility may not receive or incinerate any hazardous waste materials as defined in 40 CFR Part 216, Subpart D.

(12) The permittee shall have this incinerator inspected monthly using preventive maintenance procedures recommended by the equipment manufacturer. Each inspection shall include a written report identifying any needed repairs to the unit. If repairs are needed, the incinerator shall not be operated if the operation would result in any exceedance of the emission limits detailed in this permit. These repairs shall be completed within 30 days of the inspection. If a time period longer than 30 days is needed to complete the repairs, the Ohio EPA Northeast District Office shall be notified in writing. This notice shall list the repairs needed and the reason(s) the repairs could not be accomplished within the required time period. All inspection and repair reports shall be kept by the permittee for a period of 5 years and shall be made available to the Director (the Ohio EPA Northeast District Office) upon request.

(13) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart Ec, including the following sections:

60.53c	Operator training and qualification requirements
60.55c	Waste management plan
60.56c	Establish the appropriate maximum and minimum operating parameters for the installed air pollution control system, as site specific operating parameters during either the initial performance testing or most recent performance test as petitioned by the permittee
60. 56c	Determine and submit following the completion of the installed air pollution control system, which scenarios involving the operation of the affected facility above the maximum or below the minimum operating parameters, or which other facility operating requirements or parameters shall constitute a violation of any of the emission limitations

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the primary combustion exhaust gas temperature, the secondary combustion exhaust gas temperature, and the bypass stack temperature when the incinerator is in operation. Units shall be in degrees Fahrenheit. Accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be within 0.75 percent of the temperature being measured or 2.5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

(2) Radioactive waste shall not be charged to this incinerator. The permittee shall operate and maintain equipment to continuously monitor the radioactivity of all waste prior to combustion. This monitor shall be equipped with an alarm which sounds a warning when radioactive waste is present. For purposes of this permit, radioactive waste shall be defined as any waste which measures above ambient background levels of radiation. All radioactive infectious waste shall be managed in accordance with the applicable rules of the Ohio Department of Health and the regulations of the United States Nuclear Regulatory Commission.

(3) A scale (accurate to within one pound) shall be installed near this incinerator to weigh all of the material charged to the unit. A record of the amount of material charged to this unit, on a pound per hour basis, shall be maintained.

(4) A logbook shall be maintained for each continuous emissions monitoring system installed on this incinerator to document all activities involving the monitoring systems. Appropriate records should include, as a minimum, preventive maintenance, quality assurance and corrective action activities.

(5) Prior to burning any infectious waste in this incinerator, the permittee shall install, operate and maintain equipment to continuously monitor and record the CO emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60, section 60.13 and Appendix B, Performance Specification 4. The permittee shall maintain and operate the CO continuous emissions monitoring (CEM) system in accordance with 40 CFR Part 60, Appendix F. Any new CEM system for CO shall be designed so that the requirements in 40 CFR Part 60, Appendix F can be achieved.

The permittee shall operate a CEM system to measure oxygen concentrations, for adjusting pollutant concentrations to 7 percent oxygen.

(6) The permittee shall document all instances of CO values in excess of the limitations specified in the terms and conditions of this permit and in 40 CFR Part 60, Subpart Ec.

(7) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart Ec, including the following sections:

60.57c(a)	Install, calibrate, maintain, and operate devices to monitor applicable maximum and minimum operating parameters listed in Table 3 to this subpart
60.57c(b)	Install, calibrate, maintain, and operate devices to monitor operating parameters of the selective noncatalytic reduction system
60.57c(c)	Install, calibrate, maintain, and operate a device to, or method for measure/measuring the use of the bypass stack
60.57c(d)	Install, calibrate, maintain, and operate equipment necessary to monitor site-specific operating parameters
60.57c(e)	Ensure the permittee meets the minimum valid monitoring data requirements.
60.57c(f) and (g)	Ensure the HWIWI undergoes an initial air pollution control system inspection, and subsequent inspections annually
60.57c(h)	Install, calibrate, maintain, and operate a bag house leak detection system
60.58c(b)	Maintaining records of site-specific operating parameters
60.58c(b)	Maintaining records of the initial air pollution control device inspection, and subsequent annual inspections
60.58c(b)	Maintaining records of the bag house leak detection system
60.58c(b)	Maintaining records of operator training and qualification requirements
60.58c(b)	Maintaining records of calibration of any monitoring equipment
60.58c (f)	Maintaining of onsite records.

e) Reporting Requirements

(1) The permittee also shall submit quarterly deviation (excursion) reports that identify all periods of operation during which the maximum charge rate exceeded the limitation specified in c)(1) above, including the actual charge rates for all such periods of operation. The quarterly deviation reports shall be submitted in accordance with Standard Term and Condition A.2.

(2) The permittee shall submit quarterly deviation (excursion) reports that provide the following information for each period during which the primary or secondary combustion chamber exhaust gas temperature falls below the applicable limitation during normal operation:

a. the date of the excursion;

b. the time interval over which the excursion occurred;

c. the temperature values during the excursion;

d. the cause(s) for the excursion; and

e. the corrective action which has been or will be taken to prevent similar excursions in the future.

The quarterly deviation reports shall be submitted in accordance with Standard Term and Condition A.2.

(3) Pursuant to 40 CFR Part 60, section 60.7 and 60.13(h), 40 CFR Part 60, Appendix F, the permittee shall submit quarterly reports that document all instances of CO values in excess of the limitations specified in the terms and conditions of this permit. The permittee shall submit data assessment reports in accordance with 40 CFR Part 60, Appendix F. The quarterly deviation reports shall be submitted in accordance with Standard Term and Condition A.2.

(4) A comprehensive written report on the results of any emission test(s) shall be submitted within 60 days following completion of the test(s).

(5) The permittee shall submit quarterly deviation (excursion) reports identifying the following information:

a. the identification of calendar days during which required data on emission rates or the operating parameters were not obtained, to include an identification of the emission rate(s) or operating parameter(s) not measured, the reason(s) for not obtaining the data, and a description of the corrective action(s) taken to prevent a reoccurrence;

b. the identification of calendar days during which there was a malfunction of the HMIWI or its control equipment, a description of the malfunction, the time and duration of the malfunction, the corrective action(s) taken, and any measure(s) implemented to prevent a reoccurrence; and

c. the identification of calendar days during which any emission rate or operating parameter exceeded the applicable limits, with a description of the exceedance(s), reason(s) for such exceedance(s), a description of the corrective action(s) taken, and any measure(s) implemented to prevent a reoccurrence.

These quarterly deviation reports shall be submitted in accordance with Standard Term and Condition A.2.

(6) The permittee shall submit semiannual reports for the HMIWI containing the information specified below:

a. the values for the site-specific operating parameters established during either the initial performance testing or most recent performance test as petitioned by the permittee, demonstrating the HMIWI was in compliance;

b. the identification of calendar days during the preceding 6-month reporting period during which required data on emission rates or the operating parameters were not obtained, to include an identification of the emission rates or operating parameters not measured, the reason(s) for not obtaining the data, and a description of the corrective action(s) taken to prevent a reoccurrence;

c. the identification of calendar days during the preceding 6-month reporting period for which there was a malfunction of the HMIWI or its control equipment, a description of the malfunction, the time and duration of the malfunction, and the corrective action(s) taken to correct it;

d. the identification of calendar days during the preceding 6-month reporting period for which any emission rate or operating parameter exceeded the applicable limits, with a description of the exceedances, reasons for such exceedances, and a description of the corrective action(s) taken;

e. if a performance test was conducted during the reporting period, the results of that test;

f. if no exceedances of the emission limits or the operating parameters or no malfunctions of the HMIWI or control equipment were recorded for the semiannual reporting period, a statement that no exceedances occurred during the reporting period;

g. the date, time, and duration of any use of the bypass stack; the reason for the malfunction, and the corrective action(s) taken; and

h. any activation of the radioactivity alarm, the reason for the alarm, and the corrective action(s) taken.

The semiannual reports shall be submitted no more than 6 months following the previous report and all reports shall be signed by the facility manager.

(7) The permittee shall maintain records, submit semiannual reports and such other notifications and reports to the Ohio EPA Northeast District Office and US EPA as required pursuant to 40 CFR Part 60, Subpart Ec, per the following sections:

60.58c(a)	Prior to startup, if applicable, the petition for site-specific operating parameters under 60.56c
60.58c(c)	Submission of emission test results
60.58c(d)	Submission of reports
60.58c(g)	Submission of electronic reports
60.58c(c)	Submission of the waste management plan
60.58c(c)	Submission of records for the bag house leak detection system

f) Testing Requirements

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

a. Emission Limitation:

PE shall not exceed 18 mg PE/dscm (0.008 grain PE/dscf) of exhaust gases.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 5, Method 26A, or Method 29.

b. Emission Limitation:

CO emissions shall not exceed 11 parts per million (ppm) by volume as a 24-hour block average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the use of the continuous emissions monitoring system required in d)(5) and 60.57c.

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 10 or 10B.

c. Emission Limitation:

D/F emissions shall not exceed 9.3 ng/dscm (4.1 grains/billion dscf) of total dioxins/furans or 0.035 ng/dscm (0.015 grain/billion dscf) expressed as Toxic Equivalency Factors (TEQ).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 23.

d. Emission Limitation:

HCl emissions shall not exceed 5.1 ppm by volume.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 26 or 26A.

e. Emission Limitation:

SO_2 emissions shall not exceed 1.6 ppm by volume.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 6 or 6C.

f. Emission Limitation:

NO_x emissions shall not exceed 130 ppm by volume.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 7 or 7E.

g. Emission Limitation:

Pb emissions shall not exceed 0.00069 mg/dscm (0.0003 gr/1000 dscf).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29.

h. Emission Limitation:

Cd emissions shall not exceed 0.00013 mg/dscm (0.000057 gr/1000 dscf).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29.

i. Emission Limitation:

Hg shall not exceed 0.0013 mg/dscm (0.00057 gr/1000 dscf).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29.

j. Emission Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 6% opacity as a 6-minute block average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

k. Emission Limitation:

Visible particulate emissions of fugitive combustion ash from an ash conveying system, including transfer points, shall not exceed 5 percent of the observation period (i.e., 9 minutes per 3 hour period).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after start-up.

b. The initial performance test emission testing shall be conducted to demonstrate compliance with the limits for PE, CO, HCL, dioxins/furans, SO2, NOx, Cd, Pb, and Hg; and the appropriate parameters shall be established as required by rule during the test methods for the appropriate pollutant(s) as required in the Additional Terms and Conditions of this permit. The tests for opacity, PE, CO and HCl shall be conducted annually (no more than 12 months following the previous performance test) using the applicable procedures and test methods listed in this permit. If all three performance tests over a three year period indicate compliance with the emission limit for PE, CO and HCl, the owner or operator may forego a performance test for that pollutant for the subsequent two years. At a minimum, a performance test for PE, CO and HCl shall be conducted every third year (no more than 36 months following the previous performance test). If a performance test conducted every third year indicates compliance with the emission limit for a pollutant (PE, CO and HCl), the owner or operator may forego a performance test for that pollutant for an additional two years. If any performance test indicates noncompliance with the respective emission limit, a performance test for that pollutant shall be conducted annually until all annual performance tests over a 3-year period indicate compliance with the emission limit. The annual tests for opacity shall be conducted in any case.

c. The following test method(s) shall be employed to determine sampling location and gas composition analysis: Method 1, 3, 3A, or 3B of 40 CFR Part 60, Appendix A.

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for PE: Method 5, 26A, or 29 of 40 CFR Part 60, Appendix A.

e. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for NOx: Method 7 or 7E of 40 CFR Part 60, Appendix A.

f. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for SO2: Method 6, or 6C of 40 CFR Part 60, Appendix A.

g. The following test method(s) shall be employed to demonstrate compliance with stack opacity: Method 9 of 40 CFR Part 60, Appendix A.

h. The following test method(s) shall be employed to demonstrate compliance with visible particulate emissions of combustion ash from an ash conveying system, including transfer points: Method 22 of 40 CFR Part 60, Appendix A.

i. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for CO: Method 10 or 10B of 40 CFR Part 60, Appendix A.

j. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for HCl: Method 26 or 26A of 40 CFR Part 60, Appendix A.

k. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for dioxins/furans: Method 23 of 40 CFR Part 60, Appendix A. The minimum sample time must be 4 hours per test run. If the permittee selects the toxic equivalency standards for dioxins/furans to demonstrate compliance, the following procedures shall be used:

   i. the concentration of each dioxin/furan tetra- through octa-congener emitted shall be measured using EPA Reference Method 23;

   ii. multiply each dioxin/furan tetra- through octa-congener concentration measured by its corresponding toxic equivalency factor specified in Table 2 of 40 CFR Part 60 Subpart Ec; and

   iii. sum the products calculated above to obtain the total concentration of dioxins/furans emitted in terms of toxic equivalency.

l. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates for Pb, Cd, and Hg: Method 29 of 40 CFR Part 60, Appendix A.

m. The pollutant concentrations shall be adjusted to 7% oxygen using the following equation:

$$C_{adj} = C_{meas} (20.9 - 7) / (20.9 - \%O_2)$$

where:

C_{adj} = pollutant concentration adjusted to 7% oxygen;

C_{meas} = pollutant concentration measured on a dry basis;

20.9=oxygen concentration in air, percent; and

$\%O_2$=oxygen concentration measured on a dry basis, percent.

n. The test(s) shall be conducted at or near the maximum charge rate, unless otherwise specified or approved by the Ohio EPA, while burning representative waste. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of the performance test and

a malfunction or use of the bypass stack during testing shall invalidate the results. The permittee shall make available to the Ohio EPA Northeast District Office, upon request, any records that may be necessary to determine the conditions of the performance tests.

o. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

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

q. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 60 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

(3) The Director (Ohio EPA Northeast District Office) may request a performance test or repeat performance test at any time, if in the Director's judgment there may be a violation of any applicable emission standard or if there has been a change in the operation of the HMIWI that may cause an increase in emissions due to a change in waste streams, infectious waste generators, or other operating conditions. Therefore, following the initial compliance demonstration and if required by the Director, the permittee shall also conduct performance testing of the HMIWI for SO2, NOx, D/F, Cd, Pb, and/or Hg in order to demonstrate compliance with the limitations contained in this permit. The following applicable method(s) shall be used if it is determined a compliance demonstration is required for one or more of these pollutants:

Method 6 or 6C of 40 CFR Part 60, Appendix A to measure SO2 emissions;

Method 7 or 7E of 40 CFR Part 60, Appendix A to measure NOx emissions;

Method 23 of 40 CFR Part 60, Appendix A to measure total dioxins/furans emissions. The minimum sample time shall be 4 hours per test run; and

Method 29 of 40 CFR Part 60, Appendix A to measure Pb, Cd, and Hg emissions.

(4) The permittee shall comply with the testing requirements required under 40 CFR Part 60, Subpart Ec, including the following sections:

60.56c(a), (b), (c), (i), and (j)	Compliance and performance testing.

g) Miscellaneous Requirements

(1) None.

2. P003, CT

Operations, Property and/or Equipment Description:

Cooling tower

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.91 lb/hr, and 4.0 ton per year. See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b(2)b. below.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	PE shall not exceed 58.5 lbs/hr. See b)(2)c. below. [The emission limitation based on this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).]
e.	40 CFR Part 63, Subpart Q	Exempt, see b)(2)d., below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.

EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

(a) The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the uncontrolled potential to emit for PE is less than 10 tons/yr.

c. Once US EPA approves the December 1, 2006 version of 3745-31-05, then the requirements of OAC rule 3745-17-11(B) become effective.

d. The permittee shall not use chromium based water treatment chemicals.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for this emissions unit:

a. Each day during which any chromium based water treatment chemicals were used.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify all times during which chromium based water treatment chemicals were used.

f) Testing Requirements

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

a. Emission Limitation:

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

Applicable Compliance Method:

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

b. Emission Limitation:

PE shall not exceed 0.91 pound per hour from this emissions unit.

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Table 13.4-1 (1995 update) for wet cooling towers (0.019 lb/1000 gallons of water), and the maximum water flow rate from the application (48,000 gals/hr).

E(PE) = 48,000 gals/hr x 0.019 lb/1000 gals = 0.91 lb PE/ hr.

c. Emission Limitation:

PE shall not exceed 58.5 pound per hour from this emissions unit, as required by b)(2)c.

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Table 13.4-1 (1995 update) for wet cooling towers (0.019 lb/1000 gallons of water), and the maximum water flow rate from the application (48,000 gals/hr).

E(PE) = 48,000 gals/hr x 0.019 lb/1000 gals = 0.91 lb PE/ hr.

d. Emission Limitation:

PE shall not exceed 4.0 tons per year (tpy) from this emissions unit.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.91 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g) Miscellaneous Requirements

(1) None.