State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
COLUMBIANA COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 02-18743
Fac ID: 0215020233
DATE: 3/22/2007

Von Roll America Inc
Becky Dalrymple
1250 St. George St.
East Liverpool, OH 43920

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **NEDO**

FINAL PERMIT TO INSTALL 02-18743

Application Number:	02-18743
Facility ID:	0215020233
Permit Fee:	**$2600**
Name of Facility:	Von Roll America Inc
Person to Contact:	Becky Dalrymple
Address:	1250 St. George St. East Liverpool, OH 43920

Location of proposed air contaminant source(s) [emissions unit(s)]:
1250 St. George St
East Liverpool, **Ohio**

Description of proposed emissions unit(s):
Chapter 31 modification to PTI 17-104.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

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, 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable 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 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. 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 appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then 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.

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 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).

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 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.

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. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

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 ORC section 3704.08.

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.

10. Permit-To-Operate Application

a. If 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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.

2. 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 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 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 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 (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.)

3. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing 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 modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
PM	29.67
SO2	49.69
OC	374.71 stack
	118.11 fugitive
NOx	137.75
CO	106.62
THC	15.00
HCl	281.17

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. 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 61, Subpart J = National Emissions Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene;

   b. 40 CFR 61, Subpart V = National Emission Standard for Equipment Leaks (Fugitive Emission Sources);

   c. 40 CFR 61, Subpart FF = National Emission Standards for Benzene Waste Operations;

   d. 40 CFR 63, Subpart DD = National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations;

   e. 40 CFR Part 68 (Chemical Accident Prevention Provisions); and

   f. 40 CFR Part 60, Subpart Kb = Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commences After July 23, 1984.

2. The permittee shall comply with applicable requirements contained in OAC rule 3745-21-09 when facility operations warrant applicability. The following paragraphs are identified as applicable at the time of permit issuance.

   a. Paragraph L = Storage of petroleum liquids in fixed roof tanks
   b. Paragraph DD = Leaks from process units that produce organic chemicals

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Emissions Unit ID: B006

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (B006) - Gas-fired, Zurn Model 6M, 30.26 mm Btu/hour, auxiliary boiler

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Nitrogen oxides (NOx): 3.09 lbs/hr, 13.52 tons/year Carbon monoxide (CO): 2.59 lbs/hr, 11.36 tons/year
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-10	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input and 0.61 lb/hr.
OAC rule 3745-21-08	See section A.I.2.a.
40 CFR Part 60, Subpart Dc	See section A.I.2.b.
40 CFR Part 63, Subpart DDDDD	See section A.I.2.c.

2. Additional Terms and Conditions

2.a The permittee satisfies the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by complying with all applicable rules. On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). When the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" will no longer exist as part of the federally-approved SIP for Ohio, and this term and condition will no longer be applicable to this emissions unit.

2.b So long as only natural gas fuel is burned, this emissions unit is not subject to the emission limits listed in 40 CFR Part 60, Subpart Dc.

2.c Per 40 CFR 63.7506(b), this emissions unit is not subject to the emission limits, work practice standards, performance testing, monitoring, SSMP, site-specific

monitoring plans, record keeping and reporting requirements of this subpart or any other requirements in subpart A of this part. This emissions unit is subject to only the initial notification requirements in Section 63.9(b).

2.d Because this emissions unit is fired only with natural gas, there is no applicable emission limitation from OAC Chapter 3745-18.

II. Operational Restrictions

1. This permittee shall employ only natural gas as fuel in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain a record of the dates and times that the auxiliary boiler was in use or tested, and the total hours of operation per year.

2. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify the burning of any fuel other than natural gas in this emissions unit. Any such deviations shall be reported to the Ohio EPA Northeast District Office within 30 days of the permittee becoming aware of them.

V. Testing Requirements

1. Emission Limitation:
   Nitrogen oxide (NOx) emissions shall not exceed 3.09 lbs/hr and 13.52 tons/yr.

   Applicable Compliance Method:
   Compliance may be determined by the following equation:

   $$E = R \times EF \times H) / 1{,}000{,}000$$

   where:

   E = emissions in lbs/hr;

   R = rating capacity of auxiliary boiler, reported as 30.26 mmBtu/hr;

   EF = emission factor for NOx is 100 lbs/mmft^3, taken from AP-42 (7/98), Section 1.4, Table 1.4-1; and

H = heat content of natural gas, in ft^3/mmBtu.

If required, the hourly NOx emission rate shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 7.

The annual emission limit shall be determined by multiplying the hourly emission rate, in lbs per hour, by the number of hours of operation per year, as recorded in section A.III.1 of these terms and conditions, and then dividing by 2,000 lbs/ton.

2. Emission Limitation:
Carbon monoxide (CO) emissions shall not exceed 2.59 lbs/hr and 11.36 tons/ yr.

Applicable Compliance Method:
Compliance may be determined by the following equation:

E = R x EF x H) / 1,000,000

where:

E = emissions in lbs/hr;

R = rating capacity of auxiliary boiler, reported as 30.26 mmBtu/hr;

EF = emission factor for CO is 84 lbs/$mmft^3$, taken from AP-42 (7/98), Section 1.4, Table 1.4-1; and

H = heat content of natural gas, in ft^3/mmBtu.

If required, the hourly CO emission rate shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 10.

The annual emission limit shall be determined by multiplying the hourly emission rate, in lbs/hr, by the number of hours of operation per year, as recorded in Section A.III.1 of these terms and conditions, and then dividing by 2,000 lbs/ton.

3. Emission Limitation:
Particulate emissions shall not exceed 0.020 lb/mm Btu and 0.61 lb/hr.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and 5 or 10.

4. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Emissions Unit ID: B006

Issued: 3/22/2007

Applicable Compliance Method:
If required, compliance shall be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. The limits and requirements contained in this permit supersede those for B006 established in PTI No. 17-1123 and in the modification to PTI No. 17-1123 issued on June 22, 1995.

Issued: 3/22/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (B006) - Gas-fired, Zurn Model 6M, 30.26 mm Btu/hour, auxiliary boiler

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Emissions Unit ID: F001

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (F001) - Paved and unpaved roadways and parking areas

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)(2)	See section A.I.2.a.
OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from the paved roadways and parking areas except for a period of time not to exceed 6 minutes during any 60-minute period.
OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from the unpaved roadways and parking areas except for a period of time not to exceed 13 minutes during any 60-minute period.
OAC rule 3745-17-08(B)	The permittee shall utilize reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See sections A.I.2.b through A.I.2.e.

2. Additional Terms and Conditions

2.a The permittee has agreed to the following voluntary restriction for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. To adequately vacuum sweep the paved roadway and parking area at a sufficient frequency to ensure controlled potential particulate emissions are less than 10.0 tons per year.

2.b The permittee shall employ reasonably available control measures on all paved and 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 paved roadways and parking areas by vacuum sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally effective control measures to ensure compliance.

2.c The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved and unpaved 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

2.d 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.e 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.

II. Operational Restrictions

1. The permittee shall ensure that the calculated controlled, fugitive particulate emissions are kept less than ten tons per year. At the time of this permit issuance, the paved and unpaved roadways and parking areas emit a controlled fugitive particulate emission of 3.29 tons per year using a maximum of 12,321.88 miles traveled on the paved roadway and a maximum of 193.03 miles traveled on the unpaved roadway.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform inspections of each paved and unpaved roadway segment and paved and unpaved parking area daily for one calendar quarter. If no visible emissions are noted for each daily inspection during that calendar quarter, then the frequency may become weekly for each paved roadway segment and paved parking area. If visible emissions are noted during a weekly inspection, the permittee shall revert to daily inspections and perform daily inspections until no visible emissions are documented for an entire calendar quarter, at which time the permittee may again perform inspections on a weekly basis.

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.

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

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

   b. the date 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.3.d shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

4. The permittee shall maintain an annual record of the estimated total number of vehicle miles traveled on the paved roadways and parking areas, and also on the unpaved roadways and parking areas.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   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 quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions. The written reports shall be submitted quarterly to the Ohio EPA Northeast District Office, i.e., by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

   If no deviation occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

V. Testing Requirements

1. Emission Limitation:
   There shall be no visible particulate emissions from the paved roadways and parking areas except for a period of time not to exceed 6 minutes during any 60-minute period.

   Applicable Compliance Method:
   If required, compliance with the visible emission limitation for the paved roadways and paved 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.

2. Emissions Limitation:
   There shall be no visible particulate emissions from the unpaved roadways and parking areas except for a period of time not to exceed 13 minutes during any 60-minute period.

   Applicable Compliance Method:
   If required, compliance with the visible emission limitation for the 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.

VI. Miscellaneous Requirements

1. The limits and requirements contained in this permit supersede those for F001 established in PTI No. 17-104.

Emissions Unit ID: F001

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (F001) - Paved and unpaved roadways and parking areas

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 3/22/2007

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (F002) - Loose solid waste receiving and handling operations in Pit 1 (1501) and Pit 2 (1502)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Controlled, organic compounds shall not exceed 82.55 lbs per hour and 361.57 tons per year. Fugitive, organic compounds shall not exceed 118.11 tons per year. See sections A.I.2.a through A.I.2.m.
OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. See section A.I.2.c.
OAC rule 3745-17-08(B)	The permittee shall utilize reasonable 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.
40 CFR Part 61, Subpart FF	The requirements specified by this subpart are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.m.
40 CFR Part 63, Subpart DD	The requirements specified by this subpart are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.m.

2. Additional Terms and Conditions

2.a The loose solid waste receiving and handling operations shall be contained in an enclosure meeting the criteria for a Permanent Total Enclosure specified in "Procedure T - Criteria for and Verification of a Permanent or Temporary Total Enclosure" in 40 CFR 52.741, Appendix B. The enclosure may have permanent or temporary openings to allow worker access; passage of material into or out of the enclosure by conveyor, vehicles, or other mechanical means; entry of permanent mechanical or electrical equipment; or direct airflow into the enclosure.

2.b The overhead doors to this emissions unit shall remain closed at all times when waste is contained within the enclosure except for the following events: 1) waste materials are being placed inside; 2) waste materials inside the enclosure need to be rearranged and the doors need to be open to allow for equipment maneuverability; 3) an emergency such as a fire necessitates the doors to be open for effective control; 4) needed maintenance activities cannot be performed unless the doors are open and 5) needed brief visual assessment of pit capacity. At no time shall the doors be open when waste is actively being handled to be fed to the incinerator.

2.c This emissions unit, as a permanent total enclosure, should not allow any fugitive emissions of any pollutant from exiting from the egress points when the overhead doors are closed. However, when the overhead doors are opened for the activities listed in section A.I.2.b, any outward flow of air may contain fugitive organic compound and fugitive particulate emissions.

2.d Emissions from the loose solid waste receiving and handling operations shall be vented through a closed-vent system (vapor recovery system) to the incinerator (emissions unit N001) and/or to the carbon adsorption system.

2.e The vapor recovery system shall be in operation when waste is contained within the enclosure. The incinerator and/or the carbon adsorption system, as control devices, shall also be in operation when waste is contained and processed within the enclosure.

2.f The vapor recovery system upstream from the ventilation header blower shall be operated at a pressure below atmospheric pressure so that there is adequate suction, or inward flow, into the vapor recovery system. The draft shall have sufficient volume and velocity to minimize or eliminate fugitive dust escaping the

building when the overhead doors need to be opened.

2.g The incinerator, as a control device for this emissions unit, shall achieve a destruction efficiency of 99.99% for organic compounds.

2.h The carbon adsorption system shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

2.i The carbon adsorption system shall consist of two or more trains of a primary and a secondary carbon box operated in series. The trains shall be arranged in parallel. All boxes shall be the same size and have a maximum design flow rate of no less than 10,000 cfm. The carbon adsorption system shall be installed, operated and maintained in accordance with the "Von Roll's Routine Maintenance Procedure for Vapor Recovery Management" dated October 27, 2006, (also referred to as the "Routine Maintenance Procedure").

2.j The existing carbon within the carbon adsorption system shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. Carbon breakthrough will be determined by a reading of 50 ppm as a 60-minute rolling average from the Total Hydrocarbon (THC) Continuous Emissions Monitor (CEM) located between the first and second carbon bed in each train. This CEM shall be referred to as an Inter-Box CEM. The permittee is permitted to replace the carbon more frequently, i.e., before breakthrough is indicated, if the permittee determines that the carbon within any box is not effectively adsorbing volatile organic compounds, including benzene.

2.k The vapor recovery system, or closed-vent system, shall comply with the following requirements:

i. Be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h).

ii. All gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

iii. One or more devices which vent directly to the atmosphere may be used on the closed-vent system provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the closed-vent system resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.

2.l The permittee shall control equipment leaks from each equipment component of this emissions unit in accordance with sections 61.242 through 61.247 in 40 CFR Part 61, Subpart V - National Emission Standards for Equipment Leaks.

2.m When this emissions unit is subject to the requirements of 40 CFR Part 61, Subpart FF (National Emissions Standards for Benzene Waste Operation), the permittee is exempt from Section 63.685 (standards for tanks) of 40 CFR Part 63, Subpart DD. Because benzene may be present in the waste handled by this emissions unit at any given time, the requirements contained in both 40 CFR Part 61, Subpart FF and 40 CFR Part 63, Subpart DD serve as a basis for determining the Best Available Technology established pursuant to OAC rule 3745-31-05(A)(3).

2.n Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous THC monitoring system, designed to ensure continuous valid and representative readings of THC emissions in units of parts per million. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous THC monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of parts per million, in accordance with and at the frequencies required per 40 CFR Part 60.

II. Operational Restrictions

1. The permittee shall operate a sufficient number of trains in the carbon adsorption system to ensure that the flow rate through each primary carbon box does not exceed the manufacturer's recommended maximum design air flow rate.

2. When breakthrough within a train of the carbon adsorption system occurs, the permittee shall discontinue the use of that train as soon as possible but not longer than 12 hours after detection of breakthrough. The change-out must be completed within 48 hours after the use of the train that has been discontinued. The change-out will be performed such that the secondary carbon box becomes the primary box and a new carbon box is installed as the secondary box.

3. If an Inter-Box CEMS reading is equal to or greater than 50 ppm on a 60-minute rolling

average within 15 days after a change-out, the permittee is not required to initiate and complete a new change-out of the primary box pursuant to the Routine Maintenance Procedure. Instead, as expeditiously as possible, the permittee shall initiate and complete an investigation of the cause of the elevated Inter-Box CEMS reading to determine if the carbon within the primary box actually is spent or otherwise not functional. If the permittee determines the carbon within the primary box is spent or otherwise not functional, the permittee shall immediately initiate and complete a change-out of the primary box pursuant to the Routine Maintenance Procedure. If the permittee determines that the elevated Inter-Box CEMS reading is not caused by spent or non-functional carbon, the permittee shall implement corrective actions, if any to eliminate the cause(s) of the elevated readings. If within 5 days after the elevated Inter-Box CEMS reading, the permittee cannot determine the cause of the elevated reading, the permittee immediately shall initiate and complete a change-out of the primary box pursuant to the Routine Maintenance Procedure.

4. The permittee shall maintain on-site a sufficient supply of fresh carbon or a spare carbon box containing fresh carbon to enable a change-out procedure to be performed in a timely manner.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform the verification procedure for the enclosure as specified in section 5.0 of Procedure T annually.

2. The permittee shall perform daily inspections of the enclosure of this emissions unit and of the overhead doors, to ensure that they are in good operating condition. The permittee shall look for cracks, openings, broken seals or any other condition that would allow outward flow from the emissions unit. If outward flow is discovered, corrective action shall be performed as soon as possible. The permittee shall record inspection findings and corrective action taken in a log.

3. The permittee shall record the date and duration, in minutes, of each event when the overhead doors are open.

4. Each time the overhead doors need to be opened, the permittee shall perform a check for any visible particulate emissions. The presence or absence of any visible fugitive emissions and the date shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the location and color of the emissions;

   b. whether the emissions are representative of normal operations;

   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

   d. the total duration of any visible emission incident; and

   e. any corrective actions taken to minimize or eliminate the visible emissions.

   If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period. With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal

emissions.

5. The permittee shall install, calibrate, operate and maintain equipment to continuously monitor and record total hydrocarbons (THC), in units of parts per million, between the first and second carbon bed of each train of the carbon adsorption system (Inter-Box CEMS) for the purpose of determining breakthrough. A THC monitor and recorder shall also be on the exhaust vent stream.

   a. A statement of approval of the continuous THC monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the performance specifications tests and a statement by the Agency that the system is considered approved for use in accordance with the requirements of 40 CFR Part 60, Appendix B, performance Specification 8A - Specifications and Test Procedures for Total Hydrocarbon Continuous Monitoring Systems in Stationary Sources. Proof of approval shall be made available to the Director (Ohio EPA Northeast District Ohio) upon request.

      Each continuous monitoring system consists of all the equipment used to acquire and record data in parts per million, and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

   b. The permittee shall operate and maintain equipment to continuously monitor and record THC emissions in units of parts per million. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

   c. The permittee shall maintain records of data obtained by the continuous THC monitoring system including, but not limited to:

      i. emissions of THCs in parts per million on an instantaneous (one-minute) basis;

      ii. emissions of THCs in parts per million on a 60-minute rolling average;

      iii. results of quarterly cylinder gas audits;

      iv. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

v. results of required relative accuracy test audits (or PS 8A alternative);

vi. hours of operation of the emissions unit, continuous THC monitoring system, and carbon adsorption system;

vii. the date, time, and hours of operation of the emissions unit without the carbon adsorption system and/or the continuous THC monitoring system;

viii. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous THC monitoring system; and,

ix. the reason (if known) and the corrective actions taken (if any) for each such event in (c.vii) and (c.viii). These records shall be kept at the facility no less than 3 years and be available for inspection upon request by the Ohio EPA.

6. With respect to each Inter-Box CEMS, the permittee shall comply with Performance Specification 8A, except that the permittee shall:

   a. to the extent that the permittee utilizes two ducts between each primary and each secondary box for pressure control purposes, be permitted to utilize a sample location on only one of the two ducts;

   b. keep the sample probe heated to approximately the same temperature as, or slightly higher than, the temperature inside the duct in which it is inserted;

   c. establish a span value of 200 ppm propane; and

   d. utilize the following three test points for conducting calibration error tests:

      i. Zero Level: zero to 0.1 ppm;
      ii. Mid-Level: 40 to 60 ppm;
      iii. High-Level: 140 to 160 ppm.

7. On a continuous basis, the permittee shall direct the Inter-Box CEMS data to the facility's control system and shall maintain an alarm that will sound whenever breakthrough between a primary and a secondary carbon box occurs.

8. During times when a train of the carbon adsorption system is not in use, the permittee shall record "no flow" instead of a THC concentration for the respective Inter-Box CEMS.

9. The permittee shall maintain the following annual records:

   a. the amount of waste processed within the emissions unit, in tons per year;

b. an approximate, average percent of organic material within the solid waste placed within the emissions unit;

c. the percent volatilization of the organic material with the highest vapor pressure that was processed within the emissions unit;

d. the organic compound emissions (OCE) from the waste, in tons per year, calculated by the following equation:

OCE = (Amount of waste processed, tons/yr) x (% organics in the waste, as a decimal) x (*maximum percent volatilization of organics in waste, as a decimal)

*If the actual, maximum percent volatilization of the organics in the waste cannot be ascertained, the permittee shall use 100% or 1.00.

e. the percent of time, as a decimal, of when the overhead doors were open during the year as calculated by the following equation:

% of time open, as a decimal = summation of minutes open, as recorded in section III.3, divided by 525,600 minutes;

f. the percent of time, as a decimal, of when the overhead doors were closed during the year as calculated by the following equation:

% of time closed, as a decimal = 1 - (result of section A.III.9.e)

g. a calculation of the fugitive organic compound emissions by use of the following equation:

E *fugitive* (tons OC/year) = (OCE) x (% open) x (0.10)

where:

E *fugitive* = tons of fugitive organic compounds per year;

OCE = organic compound emissions from the waste, in tons per year, as calculated in section A.III.9.d;

% open = the percent of time, as a decimal, of when the overhead doors were open during the year as calculated and recorded in

section A.III.9.e; and

0.10 = 10% of emissions are assumed to be fugitive emissions when the overhead doors are open. 90% of emissions are assumed to be captured when the overhead doors are open.

h. a calculation of the captured emissions, calculated by the following equation:

Cap E = (OCE)(%open)(0.90) + (OCE)(%closed)(1.00)

where:

Cap E = tons organic compounds captured and vented through vapor recovery to the incinerator and/or carbon adsorption system;

OCE = organic compound emissions from the waste, in tons per year, as calculated in section A.III.9.d;

% open = the percent of time, as a decimal, of when the overhead doors were open during the year as calculated and recorded in section A.III.9.e;

% closed = the percent of time, as a decimal, of when the overhead doors where closed during the year as calculated and recorded in section A.III.9.f;

0.90 = when the doors are open, 90% of the emissions are assumed to be captured; and

1.00 = when the doors are closed, 100% of the emissions are assumed to be captured.

i. a calculation of the controlled organic compounds emissions, as calculated by the following equation:

E (tons OC/year) = [(Cap E x I) x (1 - 0.99)] + [(Cap E x C) x (1 - 0.95)]

where:

E = tons of controlled organic compounds per year;

Cap E = tons of captured organic compound emissions as calculated and recorded in section A.III.9.h;

I = Approximate percent of emissions, as a decimal, within the vapor recovery system that were vented to the incinerator; and

C = Approximate percent of emissions, as a decimal, within the vapor recovery system that were vented to the carbon adsorption system.

I + C must equal 100% or 1.00. Typical operation at the time of permit issuance is 85 - 90% of emissions to the incinerator and 10 - 15% of emissions to the carbon adsorption system. The annual OC limit of 361.57 tons/year was calculated using worst case scenario of I = 0 and C = 1.00.

10. The permittee shall perform quarterly, visual inspections of the vapor recovery system and control devices (incinerator and carbon adsorption system). The visual inspection shall include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connection.

    If visible defects are observed during an inspection, or if other problems are identified, or if detectable emissions are measured, a first effort to repair the vapor recovery system and control device shall be made as soon as practicable but no later than 5 calendar days after detection. Repair shall be completed no later than 15 calendar days after the emissions are detected or the visible defect is observed. Exception for delay of repair would be allowed per 40 CFR 61.350.

11. The permittee shall install, calibrate, maintain and operate according to the manufacturer's specifications a device equipped with a continuous recorder to monitor the organic compound emissions from the exhaust vent stream from the carbon adsorption system. This record shall be reviewed at least once per day.

12. The permittee shall maintain, and retain for the life of each control device, the following records:

    a. a statement signed and dated by the permittee certifying that the vapor recovery system and control device (incinerator and carbon adsorption system) are designed to operate at the documented performance level when this emissions unit is operating at the highest load or capacity. The document will therefore include the following:

        i. a statement certifying that the vapor recovery system is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, is designed so that all gauging and sampling devices be gas-tight except when gauging or

sampling is taking place, and that any rupture discs remain closed during normal operation.

ii. a statement certifying that the incinerator can achieve a 99.99% destruction efficiency for organic compounds when this emissions unit is operating at its highest load or capacity; and

iii. a statement certifying that the carbon adsorption system can achieve a 95% control efficiency for organic compounds when this emissions unit is operating at its highest load or capacity.

b. the design analysis showing control device performance. The design analysis shall include specifications, drawings, schematics, and piping and instrumentation diagrams prepared by the owner or operator, or the control device manufacturer or vendor that describe the control device design based on acceptable engineering tests.

For the incinerator, the design analysis shall consider the vent stream composition, constituent concentrations, and flow rate. The design analysis shall also establish the design minimum and average temperature in the combustion zone and the combustion zone residence time.

For the carbon adsorption system, the design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature. The design analysis shall also establish the design exhaust vent stream organic compound concentration level, capacity of carbon bed, type and working capacity of activated carbon used for carbon bed, and design carbon replacement interval based on the total carbon working capacity of the control device and source operating schedule.

13. The permittee shall install, calibrate, maintain and operate according to the manufacturer's specifications a device equipped with a continuous recorder to monitor the pressure in the vapor recovery system upstream from the ventilation header blower. This record shall be reviewed at least once per day.

14. The permittee shall install, calibrate, maintain and operate according to the manufacturer's specifications a device to continuously monitor the temperature in the combustion chamber of the incinerator, as a control device for this emissions unit. The temperature monitoring device shall have an accuracy of plus or minus 1 percent of the temperature being monitored in degree Celsius, or plus or minus 0.5 degree Celsius, whichever is greater. This record shall be reviewed according to the terms and conditions for emissions unit N001.

15. The permittee shall maintain records that contain the following information:

a. a record of any time when the vapor recovery system was not in operation when

waste was contained and/or processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action taken, if any;

b. any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was contained and/or processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action taken, if any;

c. any record indicating that the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action, if any; and

d. any record indicating detectable emissions from the vapor recovery system and/or any equipment component of this emissions unit. This record may be included in the monthly Leak Detection and Repair Program report.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;

   b. any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;

   c. any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;

   d. any record indicating detectable emissions from the vapor recovery system and/or any equipment component of this emissions unit;

   e. an identification of the days when cracks, openings, broken seals or any other condition allowing outward flow from the emissions unit were discovered by the

daily inspection of the overhead doors and/or enclosure and a description of the corrective action, and when it was performed, would be included in the report; and

f. an identification of the days during which any visible emissions of fugitive dust were observed when the overhead doors were opened and a description of any corrective actions taken, if any, to minimize or eliminate the visible emissions.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions. The written reports shall be submitted quarterly to the Ohio EPA Northeast District Office, i.e., by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

If no deviation occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

V. Testing Requirements

1. Emission Limitation:
Controlled organic compounds shall not exceed 82.55 lbs per hour.

Applicable Compliance Method:
Compliance shall be determined by the record keeping and calculation in section A.III. The lb/hr limit shall be calculated by multiplying the annual controlled organic compound emissions by 2,000 lbs-yr/8,760 hrs-ton.

2. Emission Limitation:
Controlled organic compounds shall not exceed 361.57 tons per year.

Applicable Compliance Method:
Compliance shall be determined by the record keeping and calculation in section A.III.

3. Emission Limitation:
Fugitive organic compounds shall not exceed 118.11 tons per year.

Applicable Compliance Method:
Compliance shall be determined by the record keeping and calculation in section A.III.

4. Emission Limitation:
Visible emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

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

Issued: 3/22/2007

VI. Miscellaneous Requirements

1. The limits and requirements contained in this permit supersede those for F002 established in PTI# 17-104.

Issued: 3/22/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (F002) - Loose solid waste receiving and handling operations (Pits 1 and 2)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Emissions Unit ID: F003

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (F003) - Slag and fly ash transfer systems

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See section A.I.2.a.
OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
OAC rule 3745-17-08(B)	The permittee shall utilize reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See section A.I.2.b.

2. Additional Terms and Conditions

2.a The maximum potential fugitive particulate emissions are calculated to be less than 10 tons per year. Therefore, OAC rule 3745-31-05(A)(3) is not applicable.

2.b The permittee shall maintain the following control measures to minimize or eliminate visible emissions of fugitive dust:

i. The slag and fly ash transfer systems shall employ sealed conveyors and transfer points to minimize or eliminate any visible emissions of fugitive dust.

ii. The tanker truck loading area shall employ an adjustable loading spout that completely seals against the tanker hatch so as to minimize or eliminate any visible emissions of fugitive dust.

iii. The slag entering the slag conveyor shall be adequately wetted to minimize or eliminate any visible emissions of fugitive dust.

iv. The trucks hauling slag and fly ash shall be covered prior to leaving the plant property.

Issued: 3/22/2007

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily inspections of the slag and fly ash transfer systems to ensure that all enclosures are in good operating condition. The permittee shall record inspection findings and corrective action taken in a log.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any fugitive visible emissions for one calendar quarter. The presence or absence of any fugitive visible emissions shall be noted in an operations log. If fugitive visible emissions are observed, the permittee shall also note the following in the operations log:

   a. the location and color of the emissions;
   b. whether the emissions are representative of normal operations;
   c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   d. the total duration of any visible emission incident; and
   e. any corrective actions taken to minimize or eliminate the visible emissions.

   If no visible emissions are noted for each daily inspection during that calendar quarter, then the frequency may become weekly. If visible emissions are noted during a weekly inspection, the permittee shall revert to daily inspections and perform daily inspections until no visible emissions are documented for an entire calendar quarter, at which time the permittee may again perform inspections on a weekly basis.

   If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period. With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal emissions.

3. The permittee shall record the amount of fly ash and slag, in tons, processed each year.

4. The permittee shall calculate and record the fugitive particulate emissions each year from this emissions unit using the following equation:

$$E = (EF \times N_1 \times W_1) \times (1 \text{ ton}/2{,}000 \text{ lbs}) + (EF \times N_2 \times W_2) \times (1 \text{ ton}/2{,}000 \text{ lbs})$$

where:

E = emissions in tons particulate per year;

EF = emission factor of 0.003 lb PE/ton, taken from AP-42 11.19.2-2 (8/04) - Crushed stone processing operations - conveyor transfer points;

N_1 = number of transfer points for fly ash is 9;

W_1 = amount of fly ash, in tons, processed each year, as recorded in section A.III.3;

N_2 = number of transfer points for slag is 2; and

W_2 = amount of slag, in tons, processed each year, as recorded in section A.III.3.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. each day when the enclosures were not found to be in good operating condition and the corrective actions taken; and

   b. each day or week during which any fugitive visible emissions were observed and the corrective actions taken.

   The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions. The written reports shall be submitted quarterly to the Ohio EPA Northeast District Office, i.e., by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

   If no deviation occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

V. Testing Requirements

Issued: 3/22/2007

1. Emission Limitation:
   Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

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

VI. Miscellaneous Requirements

1. The limits and requirements contained in this permit supersede those for F003 established in PTI# 17-104.

Issued: 3/22/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (F003) - Slag and fly ash transfer systems

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 3/22/2007

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (F004) - Pneumatic lime and activated charcoal handling system. Lime silo is equipped with a fabric filter.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.32 pound particulate per hour and 1.4 tons particulate per year from the lime silo stack The visible particulate emissions from the lime silo stack shall not exceed 5% opacity as a 6-minute average. Visible emissions of fugitive dust shall not exceed 5% opacity as a 3-minute average. See Section A.I.2.a.
OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(B)	The visible emissions of fugitive dust limitation specified by this rule is less stringent than the visible emissions of fugitive dust limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08(B)	The permittee shall utilize reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See section A.I.2.b.
OAC rule 3745-17-11	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Emissions Unit ID: F004

2. Additional Terms and Conditions

2.a The fabric filter achieving an outlet grain loading rate of 0.030 grain per dry standard cubic foot shall be in operation on the lime silo stack while this emissions unit is in operation.

2.b The permittee shall maintain the following control measures:

i. The bulk lime shall be pneumatically transferred to the storage silo. The pneumatic system shall be adequately enclosed so as to minimize visible emissions of fugitive dust.

ii. The bulk lime storage silo shall be vented to the fabric filter. The enclosure shall be sufficient to minimize visible emissions of fugitive dust.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop in inches of water across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The permittee shall record the pressure drop in inches of water across the baghouse on a weekly basis.

   The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications. The permittee has reported this range to be 0.5 to 8.0 inches of water.

2. The permittee shall perform daily inspections of the pneumatic lime and activated charcoal handling system to ensure that all enclosures are in good operating condition.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any visible particulate emissions from the lime silo stack and for any fugitive visible emissions from the egress points for one calendar quarter. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the

following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

If no visible emissions are noted for each daily inspection during that calendar quarter, then the frequency may become weekly. If visible emissions are noted during a weekly inspection, the permittee shall revert to daily inspections and perform daily inspections until no visible emissions are documented for an entire calendar quarter, at which time the permittee may again perform inspections on a weekly basis.

4. The permittee shall record the amount of lime and charcoal (carbon), in tons, handled each year. The permittee shall also calculate the fugitive particulate emissions from this emissions unit by using the following equation:

$$E = (EF \times N1 \times W1) \times (1 \text{ ton}/2{,}000 \text{ lbs}) + (EF \times N2 \times W2) \times (1 \text{ ton}/2{,}000 \text{ lbs})$$

where:

E = emissions in tons particulate per year;

EF = emission factor of 0.003 lb PE/ton, taken from AP-42 11.19.2-2 - Crushed stone processing operations - conveyor transfer points (8/04);

N1 = number of transfer points for lime handling is 7;

W1 = amount of lime, in tons, processed each year as recorded in section A.III.4;

N2 = number of transfer points for charcoal (carbon) is 3; and

W2 = amount of charcoal (carbon), in tons, processed each year as recorded in section A.III.4.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. the period of time when the pressure drop across the baghouse on the lime silo stack was outside the range specified in section A.III.1;

   b. any day during which the enclosures were not maintained in good operating condition and the corrective actions taken; and

   c. each day or week during which any visible emissions were observed and the corrective actions taken.

   The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions. The written reports shall be submitted quarterly to the Ohio EPA Northeast District Office, i.e., by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

   If no deviation occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

V. Testing Requirements

1. Emission Limitation:
   Visible particulate emissions from the lime silo stack shall not exceed 5% opacity as a 6-minute average.

   Applicable Compliance Method:
   If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:
   Visible emissions of fugitive dust shall not exceed 5% opacity as a 3-minute average.

   Applicable Compliance Method:
   If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

3. Emission Limitation:
   Particulate emissions from the lime silo stack shall not exceed 0.32 lb/hour.

   Applicable Compliance Method:
   If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 5.

4. Emission Limitation:
   Particulate emissions from the lime silo stack shall not exceed 1.4 ton/year.

Applicable Compliance Method:
Compliance shall be determined by multiplying the hourly rate, in lbs/hr, by (8,760 hrs/yr)(ton/2,000 lbs).

VI. Miscellaneous Requirements

1. The limits and requirements contained in this permit supersede those for F004 established in PTI # 17-104.

Issued: 3/22/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (F004) - Pneumatic lime and activated charcoal handling system. Lime silo is equipped with a fabric filter.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 3/22/2007

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (N001) - Hazardous waste incinerator (97.8 mmBtu/hour), equipped with a spray dryer, an electrostatic precipitator and a scrubber

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Sulfur dioxide emissions from the stack shall not exceed 11.34 pounds per hour and 49.69 tons per year. Nitrogen oxides emissions from the stack shall not exceed 28.36 pounds per hour and 124.23 tons per year. Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule. There shall be no visible particulate emissions of fugitive dust. Compliance with OAC rule 3745-31-05(A)(3) includes compliance with 40 CFR Part 61, Subpart C, 40 CFR Part 63, Subpart EEE and OAC rule 3745-17-07(A). See sections A.I.2.a through A.I.2.l.
40 CFR Part 61, Subpart C (NESHAP for Beryllium)	Beryllium emissions shall not exceed 10 grams per 24 hour period.
40 CFR Part 61, Subpart E (NESHAP for Mercury)	The emission limitation specified by this federal regulation is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR Part 61, Subpart FF (NESHAP for Benzene Waste Operations)	The requirements of this federal regulation are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

Emissions Unit ID: N001

40 CFR Part 63, Subpart EEE	The requirements of this federal regulation are equivalent to the requirements established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is equivalent to the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(B)	The visible particulate emission limitation for fugitive dust specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-08(B)	The requirements specified by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-09(B)	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(E)(2)	The sulfur dioxide emission limitation specified by this rule is less stringent than the sulfur dioxide emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-07(G)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-08(B)	See section A.I.2.l.

2. Additional Terms and Conditions

2.a Dioxin and furan emissions from the stack shall not exceed of 0.20 ng toxicity equivalence (TEQ) per dry standard cubic meter (dscm) corrected to 7 percent oxygen or 0.40 ng TEQ/dscm corrected to 7 percent oxygen, provided that the combustion gas temperature at the inlet to the initial particulate matter control device is 400 degrees Fahrenheit (F) or lower based on the average of the test run average temperatures.

2.b Mercury emissions from the stack shall not exceed of 130 ug/dscm corrected to 7 percent oxygen.

2.c Combined emissions of lead and cadmium from the stack shall not exceed 240 ug/dscm corrected to 7 percent oxygen. No later than October 14, 2008, combined emissions of lead and cadmium from the stack shall not exceed 230 ug/dscm corrected to 7 percent oxygen.

2.d Combined emissions of arsenic, beryllium, and chromium shall not exceed 97 ug/dscm corrected to 7 percent oxygen. No later than October 14, 2008, combined emissions of arsenic, beryllium, and chromium shall not exceed 92 ug/dscm corrected to 7 percent oxygen.

2.e Beryllium emissions from the stack shall not exceed 10 grams per 24-hour period.

2.f Carbon monoxide emissions from the stack shall not exceed 100 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen and 95.26 tons per year;

or

Hydrocarbons emissions from the stack shall not exceed 10 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, reported as propane, and 15.00 tons per year.

2.g Combined hydrochloric acid and chlorine gas emissions from the stack shall not exceed 77 parts per million by volume, expressed as hydrochloric acid equivalents, dry basis and corrected to 7 percent oxygen and 281.17 tons per year. No later than October 14, 2008, combined hydrochloric acid and chlorine gas emissions from the stack shall not exceed 32 parts per million by volume, expressed as hydrochloric acid equivalents, dry basis and corrected to 7 percent oxygen and 116.85 tons per year.

2.h Particulate emissions from the stack shall not exceed 34 mg/dscm corrected to 7 percent oxygen and 28.27 tons per year. No later than October 14, 2008, particulate emissions from the stack shall not exceed 0.013 grain/dscf corrected to 7 percent oxygen and 24.74 tons per year.

2.i This emissions unit shall achieve a destruction and removal efficiency (DRE) of 99.99% for each selected principle organic hazardous constituent (POHC).

2.j This emissions unit is not permitted to burn and shall not burn the following:

i. dioxin-listed hazardous wastes, including waste codes of F020, F021, F022, F023, F026, or F027; and

ii. any material containing asbestos.

2.k Should 40 CFR Part 63, Subpart EEE be revised such that the emissions limitations change for the pollutants mentioned in sections A.I.2.a through A.I.2.i

above, then the permittee shall comply with the most current, revised standard according to the requirements of the subpart.

2.l The permittee shall operate within all Operating Parameter Limits (OPLs) and operating requirements established during the most recent Comprehensive Performance Test (CPT) and reported in the subsequent Notice of Compliance (NOC). However, at no time, shall the minimum secondary combustion chamber temperature be established to be less than 1,600 degrees Fahrenheit.

2.m The permittee satisfies the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by complying with all applicable rules. On 11/5/05, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). When the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" will no longer exist as part of the federally-approved SIP for Ohio, and this term and condition will no longer be applicable to this emissions unit.

2.n Per 40 CFR 63.1206(b)(1), the emission standards and operating requirements of 40 CFR Part 63, Subpart EEE apply at all times except during 1) periods of startup, shutdown and malfunction; and 2) when hazardous waste is not in the combustion chamber (i.e., the hazardous waste feed to the combustor has been cut off for a period of time not less than the hazardous waste residence time) and the permittee has documented in the operating record compliance with all otherwise applicable requirements and standards promulgated under authority of section 112 or 129 of the Clean Air Act in lieu of the emission standards under 40 CFR Part 63, Subpart EEE.

II. Operational Restrictions

1. The permittee shall comply with all applicable requirements contained in the most recent version of 40 CFR 63.1206.

2. All emissions shall be vented to the control equipment (spray dryer, electrostatic precipitator, 4-stage wet scrubber and carbon injection system) associated with this emissions unit . The permittee shall maintain the control equipment in accordance with the manufacturer's operating manuals, with any adjustments or modifications deemed necessary by the permittee, and as required by the standards promulgated in 40 CFR Part 63, Subpart EEE.

3. The permittee must prepare and at all times operate according to an Operation and Maintenance Plan that describes in detail procedures for operation, inspection, maintenance, and corrective measures for all components of the combustor, including

associated pollution control equipment, that could affect emissions of regulated hazardous air pollutants.

4. The incinerator, including all associated equipment and grounds, shall be designed, operated and maintained to prevent the emissions of objectionable odors.

5. The permittee shall control combustion system leaks by the following:

   a. keeping the maximum combustion zone pressure lower than ambient pressure, which is maintained by the induced draft (ID) fan; and

   b. pressurizing the inlet and outlet end shrouds to approximately 0.2 inch of water column (or any revised pressure measure acceptable to the Ohio EPA) which provides an alternative means of control of combustion system leaks that is equivalent to maintaining the maximum pressure in the combustion zone below the ambient pressure. This control method is necessary for when the combustion of certain hazardous waste produces a positive pressure spike within the kiln and/or secondary combustion chamber.

6. The permittee shall operate the hazardous waste combustor with a functioning automatic waste feed cutoff (AWFCO) system that immediately and automatically cuts off the hazardous waste feed to the kiln and which shall be activated and operated as required in 40 CFR 63.1206(c)(3), as follows:

   a. when any Operating Parameter Limit (OPL) established during the most recent Comprehensive Performance Test (CPT) and reported in the subsequent Notice of Compliance (NOC) is exceeded;

   b. when any emission standard monitored by a Continuous Emission Monitoring System (CEM) is exceeded;

   c. The pressure in the secondary combustion chamber is greater than zero inches of water column for more than 10 seconds;

   d. The pressure in the secondary combustion chamber is greater than the pressure in the inlet or outlet end shroud at any time;

   e. The pressure in the secondary combustion chamber is greater than ambient pressure for more than 2 seconds during operating time when the pressurizing equipment for either shroud has failed;

f. when the span value of any Continuous Monitoring System, e.g., temperature monitoring devices, pressure transducers, flow meters, (except a CEM), is met or exceeded;

g. upon malfunction of a CMS that monitors an OPL established during the most recent CPT and reported in the subsequent NOC; or

h. when any component of the automatic waste feed cutoff system fails.

The AWFCO and associated alarms must be tested at least weekly to verify operability, unless the permittee documents in the operating record that weekly inspections will unduly restrict or upset operations and that less frequent inspections will be adequate; in which case, the permittee shall conduct operability testing at least monthly.

7. Start up of the incinerator shall begin with the heating of the cold combustion zone with natural gas, distillate fuel oil, or waste materials which have been classified as hazardous solely due to their ignitability. Alternate fuels may not be used unless approved by the Ohio EPA.

8. Waste material shall not be fed to the kiln until compliance with all OPLs, established during the most recent CPT and reported in the subsequent NOC, is achieved.

9. The permittee shall comply with all state and federal laws and regulations including, but not limited to, the Toxic Substances Control Act of 1979. No polychlorinated biphenyls (PCB's) in excess of 50 ppm shall be incinerated unless the permittee obtains an Ohio EPA Permit-to-Install. No high-level or low-level radioactive wastes, herbicides, pesticides, rodenticides, insecticides, or other materials shall be incinerated in violation of state and federal laws and regulations.

10. The permittee shall comply with all requirements contained in the most recent Ohio Hazardous Waste Facility Installation and Operation Permit and in all modifications.

11. When the Emergency Diesel Generator (insignificant emissions unit B001) is in operation, feeding of waste materials to the incinerator shall be suspended.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall comply with all applicable monitoring requirements contained in the most recent version of 40 CFR 63.1209.

2. The permittee shall comply with all applicable record keeping requirements listed in the most recent version of 40 CFR 63.1211. These requirements include, but may not be limited to, the following rule citations:

Emissions Unit ID: N001

40 CFR 63.1200, 63.10(b) & (c)
General. Information required to document and maintain compliance with the regulations of Subpart EEE, including data recorded by continuous monitoring systems, and copies of all notification, reports, plans, and other documents submitted to the Ohio EPA.

40 CFR 63.1206(b)(1)(ii)
If the permittee elects to comply with all applicable requirements and standards promulgated under authority of the Clean Air Act, including Sections 112 and 129, in lieu of the requirements of Subpart EEE when not burning hazardous waste, the permittee must document in the operating record compliance with those requirements.

40 CFR 63.1206(b)(5)(ii)
Documentation that a change will not adversely affect compliance with the emission standards or operating requirements.

40 CFR 63.1206(b)(11)
Calculation of hazardous waste residence time

40 CFR 63.1206(c)(2)
Startup, shutdown, and malfunction plan

40 CFR 63.1206(c)(2)(v)(A)
Documentation of investigation and evaluation of excessive exceedances during malfunctions

40 CFR 63.1206(c)(3)(v)
Corrective measures for any automatic waste feed cutoff that results in an exceedance of an emission standard or operating parameter limit

40 CFR 63.1206(c)(3)(vii)
Documentation and results of the automatic waste feed cutoff operability testing

40 CFR 63.1206(c)(5)(ii)
Method used for control of combustion leaks

40 CFR 63.1206(c)(6)
Operator training and certification program

40 CFR 63.1206(c)(7)(i)(D)
Operation and maintenance plan

40 CFR 63.1209(c)(2)
Feedstream analysis plan

40 CFR 63.1209(k)(6)(iii)

Documentation that a substitute activated carbon will provide the same level of control as the original material

<u>40 CFR 63.1209(g)</u>
Documentation of changes in modes of operation

3. The permittee shall use either a carbon monoxide (CO) or hydrocarbon (THC) continuous emissions monitoring system (CEMS) to demonstrate and monitor compliance with the CO or THC standard. The permittee shall also use an oxygen CEMS to continuously correct the CO or THC level to 7 percent oxygen.

4. The permittee shall also install, calibrate, operate and maintain equipment to continuously monitor and record opacity, sulfur dioxide, nitrogen oxide, and gas flow rate.

5. The continuous emissions (or opacity) monitoring systems have the following requirements:

   a. A statement of certification of each continuous emissions (or opacity) monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the applicable requirements of 40 CFR Part 60, Appendix A or B.

      Appendix B: Performance Specification 4B for carbon monoxide and oxygen, Performance Specification 8A for hydrocarbons, Performance Specification 1 for opacity, Performance Specification 2 for sulfur dioxide and nitrogen oxide, and Performance Specification 6 for each "mass emission rate" monitoring system.

      Proof of certification shall be made available to the Director (Ohio EPA Northeast District Office) upon request.

      Each continuous emissions (or opacity) monitoring system consists of all the equipment used to acquire and record data in units of all applicable standards, and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

   b. The permittee shall operate and maintain equipment to continuously monitor and record the pollutant emissions, in units applicable to the standards. Such continuous emissions (or opacity) monitoring and recording equipment shall

comply with the requirements specified in 40 CFR Part 60.13.

c. The permittee shall maintain records of all data obtained by each continuous emissions (or opacity) monitoring systems including, but not limited to:

i) emissions in units applicable to the standards on an instantaneous (one-minute basis);

ii) emissions for the appropriate averaging period (hourly or 6-minute block);

iii) results of quarterly cylinder gas audits;

iv) results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

v) results of required relative accuracy test audits (or PS 8A alternative);

vi) hours of operation of the emissions unit and continuous emissions (or opacity) monitoring system;

vii) the date, time, and hours of operation of the emissions unit without the continuous emissions (or opacity) monitoring system;

viii) the date, time, and hours of operation of the emissions unit during any malfunction of the continuous emissions (or opacity) monitoring system; and

ix) the reason (if known) and the corrective actions taken (if any) for each such event in (c.vii) and (c.viii).

6. The permittee shall install, calibrate, operate and maintain other continuous monitoring systems (CMS), e.g., temperature monitoring devices, pressure transducers, flow meters, to document compliance with all applicable Operating Parameter Limits (OPL) established during the most recent Comprehensive Performance Test and reported in the subsequent Notice of Compliance.

7. The permittee shall install, calibrate, operate and maintain equipment to monitor the operating parameter limits, pertaining to the control of combustion system leaks, as specified in paragraph 5 under the Operational Restrictions section of this permit.

8. The permittee shall record all periods of time when compliance with any Operating

Parameter Limit was not achieved.

9. The permittee shall obtain an analysis of each feedstream that is sufficient to document compliance with the applicable feedrate limits for mercury, semi-volatile metals, low volatile metals, total chlorine (organic and inorganic) and chloride. The permittee shall develop and implement a feedstream analysis plan. The plan, at a minimum, shall specify the following:

   a. the parameters for which each feedstream will be analyzed;

   b. documentation as to whether the analysis for each waste stream shall be performed through sampling and analysis or from analytical information;

   c. documentation as to how the analysis shall document compliance with the applicable feedrate limits;

   d. the test methods used to obtain the analysis;

   e. the sampling method used to obtain a representative sample of each feedstream analyzed;

   f. the frequency with which the permittee shall review or repeat the analysis of the feedstream;

   g. documentation for determining the mass or volume flowrate of each feedstream using a continuous monitoring system (if the flowrate of the feedstream is determined by volume, the density of the feedstream must also be determined and documented, unless the constituent concentration is in units of weight per unit volume); and

   h. procedures for calculating and maintaining records of the mass feedrate of mercury, semivolatile metals, low volatile metals, total chlorine (organic and inorganic), and chloride, as the twelve-hour rolling average maximum theoretical emission concentration (MTEC).

   The feedstream analysis plan shall be submitted to the Ohio EPA Northeast District Office upon request.

10. The permittee shall calculate the hazardous waste residence time for each waste fed to the incinerator using the equation provided in the CPT test plan under 40 CFR 63.1207(f).

11. The permittee shall develop a plan for the routine sampling and laboratory analysis of incoming wastes for the purpose of preventing polychlorinated biphenyls (PCBs), in excess of 50 ppm, from being incinerated in the kiln and the secondary combustion chamber. Such plan shall include as a minimum:

a. a copy of the standard supplier contract which prohibits the delivery of PCBs in excess of 50 ppm to the facility for incineration.

All laboratory analyses shall be reported to the permittee directly from the laboratory and shall be retained on site and available for inspection by the Ohio EPA for a minimum of five (5) years.

12. The permittee shall maintain daily records of the materials received for burning at the facility. The records shall contain, as a minimum, the following information:

    a. name and address of the facility from which the material was received;

    b. name and address of the facility from which the material was generated or blended;

    c. date the material was received;

    d. amount of material and type of container; and

    e. description of the material including chemical composition.

13. The permittee shall maintain daily records of the materials burned in the kiln and main combustion chamber. The record shall include, but not be limited to, the specific OPLs relating to waste feed rates established during the most recent CPT and reported in the subsequent NOC.

14. The permittee shall record the date, time, duration, and reason for each automatic waste feed cutoff actuated as a result of the following;

    a. an excursion from the RCRA Part B Permit;

    b. when any of the following are exceeded: operating parameter limits specified under 40 CFR 63.1209; an emission standard monitored by a continuous emissions monitoring system (CEMS); and the allowable combustion chamber pressure;

    c. when the span value of any continuous monitoring system (CMS) detector, except a CEMS, is met or exceeded;

d. upon malfunction of a CMS monitoring an operating parameter limit specified under 40 CFR 63.1209 or an emission level; or

e. when any component of the automatic waste feed cutoff system fails.

A record of the weekly AWFCO operability testing shall be maintained, and/or a record documenting that any weekly inspection will unduly restrict or upset operations, in which case, a monthly inspection shall be conducted and the event documented.

15. The permittee shall record the fuels used during incinerator startup.

16. The permittee shall maintain a record of hours of operation of the incineration system. The hours of operation shall be represented by the time during which waste or virgin fuel is being burned.

17. The permittee shall maintain a system that will allow Ohio EPA, at any time, to access the continuous monitor data from a remote location.

IV. Reporting Requirements

1. The permittee shall comply with all applicable notification requirements listed in the most recent version of 40 CFR 63.1210. These requirements include, but may not be limited to, the following rule citations:

<u>40 CFR 63.9(b)</u>
Initial notification that you are subject to 40 CFR Part 63, Subpart EEE

<u>40 CFR 63.9(d)</u>
Notification that you are subject to special compliance requirements

<u>40 CFR 63.9(j)</u>
Notification and documentation of any change in information already provided under section 63.9

<u>40 CFR 63.1206(b)(5)(i)</u>
Notification of changes in design, operation, or maintenance

<u>40 CFR 63.1207(e), 63.9(e), 63.9(g)(1) & (3)</u>
Notification of performance test and CMS evaluation

<u>40 CFR 63.1210(b)</u>
Notification of intent to comply

<u>40 CFR 63.1210(d), 63.1207(j), 63.1207(k), 63.1207(l), 63.9(h), 63.10(d)(2), 63.10(e)(2)</u>
Notification of compliance, including results of performance tests and continuous

monitoring system performance evaluations

2. The permittee shall comply with all applicable reporting requirements listed in the most recent version of 40 CFR 63.1211. These reports include, but are not limited to, the following rule citations and requirements:

   40 CFR 63.10(d)(5)(i)
   Periodic startup, shutdown, and malfunction reports are required to be submitted semiannually to the Ohio EPA Northeast District Office if a startup or shutdown causes an exceedance of any applicable emission limitation or if a malfunction occurred during the reporting period, and the actions taken by the permittee were consistent with the procedures specified in the startup, shutdown and malfunction plan.

   40 CFR 63.10(d)(5)(ii)
   Immediate startup, shutdown, and malfunction reports are required to be submitted to the Ohio EPA Northeast District Office if a startup or shutdown causes an exceedance of any applicable emission limitation or if a malfunction occurred during the reporting period, and the actions taken by the permittee were not consistent with the procedures specified in the startup, shutdown and malfunction plan. The permittee shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan followed by a letter within 7 working days after the end of the event.

   40 CFR 63.10(e)(3)
   Excessive emissions and continuous monitoring system performance report and summary report are to be submitted to the Ohio EPA Northeast District Office semiannually, except as provided by rule and by term A.IV.3 below.

   40 CFR 63.1206(c)(2)(ii)(B)
   A Startup, shutdown, and malfunction plan shall be submitted to the Ohio EPA for review and approval.

   40 CFR 63.1206(c)(3)(vi)
   Excessive exceedances reports. For each set of 10 exceedances of an emission standard or operating requirement (or OPL) while hazardous waste remains in the combustion chamber (i.e., when the hazardous waste residence time has not transpired since the hazardous waste feed was cutoff) during a 60-day block period, the permittee must submit to the Ohio EPA Northeast District Office a written report within 5 calendar days of the 10th exceedance documenting the exceedances and results of the investigation and corrective measures taken.

3. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous emissions monitoring systems (THC or CO, SO_2, NOx, Opacity):

   a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous emissions monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Northeast District Office documenting all instances of emissions in excess of any applicable limit specified in this permit and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

   b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

      i. the facility name and address;
      ii. the manufacturer and model number of each continuous emissions monitoring system;
      iii. the location of the continuous monitor;
      iv. the exceedance report as detailed in (a) above;
      v. the total emissions for the calendar quarter (tons);
      vi. the total operating time (hours) of the emissions unit;
      vii. the total operating time of the continuous emissions monitoring system while the emissions unit was in operation;
      viii. results and dates of quarterly cylinder gas audits;
      ix. results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
      x. the results of any relative accuracy test audit showing the continuous monitor out-of-control and the compliant results following any corrective actions;
      xi. the date, time, and duration of any/each malfunction of the continuous monitoring system, emissions unit, and/or control equipment;
      xii. the date, time, and duration of any downtime of the continuous monitoring system and/or control equipment while the emissions unit was in operation; and
      xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

      Each report shall address the operations conducted and data obtained during the previous calendar quarter.

V. Testing Requirements

1. The permittee shall comply with all applicable performance testing requirements contained in the most recent version of 40 CFR 63.1207, using the test methods contained in the most recent version of 40 CFR 63.1208.

2. Emission Limitation:
   Sulfur dioxide emissions shall not exceed 11.34 pounds per hour

   Applicable Compliance Method:
   Compliance shall be determined by operating the continuous emissions monitoring system (CEMS) for sulfur dioxide. Or, if required by Ohio EPA, compliance shall be determined by emissions testing, using U.S. EPA Reference Method 6 of 40 CFR, Part 60, Appendix A.

3. Emission Limitation:
   Sulfur dioxide emissions shall not exceed 49.69 tons per year.

   Applicable Compliance Method:
   Compliance shall be determined by operating the continuous emissions monitoring system (CEMS) for sulfur dioxide and making the necessary conversion from lb/hr to ton/year.

4. Emission Limitation:
   Nitrogen oxides emissions shall not exceed 28.36 pounds per hour.

   Applicable Compliance Method:
   Compliance shall be determined by operating the continuous emissions monitoring system (CEMS) for nitrogen oxides. Or, if required by Ohio EPA, compliance shall be determined by emissions testing, using U.S. EPA Reference Method 7 of 40 CFR, Part 60, Appendix A.

5. Emission Limitation:
   Nitrogen oxides emissions shall not exceed 124.23 tons per year.

   Applicable Compliance Method:
   Compliance shall be determined by operating the continuous emissions monitoring system (CEMS) for nitrogen oxides and making the necessary conversion from lb/hr to ton/year.

6. Emission Limitation:

Dioxin and furan emissions from the stack shall not exceed of 0.20 ng toxicity equivalence (TEQ) per dry standard cubic meter (dscm) corrected to 7 percent oxygen; or 0.40 ng TEQ/dscm corrected to 7 percent oxygen per year corrected to 7 percent oxygen, provided that the combustion gas temperature at the inlet to the initial particulate matter control device is 400 degrees Fahrenheit (F) or lower based on the average of the test run average temperatures.

Applicable Compliance Method:
Compliance shall be determined by emission testing, using Method 0023A, Sampling Method for Polychlorinated Dibenzo-p-Dioxins and Polychlorinated Dibenzofurans emissions from Stationary Sources, EPA Publication SW-846, as incorporated by reference in 40 CFR 63.1208(a). The permittee may sample for a minimum of three hours, and must collect a minimum sample volume of 2.5 dscm. The permittee may assume than nondetects are present at zero concentration.

After performance testing, compliance shall be determined by compliance with the applicable Operating Parameter Limits specified in 40 CFR 63.1209(k), established during the most recent CPT and reported in the subsequent NOC.

7. Emission Limitation:
Mercury emissions from the stack shall not exceed of 130 ug/dscm corrected to 7 percent oxygen.

Applicable Compliance Method:
Compliance shall be determined by emission testing, using Method 29, provided in Appendix A of 40 CFR, Part 60.

After performance testing, compliance shall be determined by compliance with the applicable Operating Parameter Limits specified in 40 CFR 63.1209(l), established during the most recent CPT and reported in the subsequent NOC.

8. Emission Limitation:
Combined emissions of lead and cadmium from the stack shall not exceed 240 ug/dscm corrected to 7 percent oxygen. No later than October 14, 2008, combined emissions of lead and cadmium from the stack shall not exceed 230 ug/dscm corrected to 7 percent oxygen.

Applicable Compliance Method:
Compliance shall be determined by emission testing, using Method 29, provided in Appendix A of 40 CFR, Part 60.

After performance testing, compliance shall be determined by compliance with the applicable Operating Parameter Limits specified in 40 CFR 63.1209(n), established during the most recent CPT and reported in the subsequent NOC.

9. Emission Limitation:

Combined emissions of arsenic, beryllium, and chromium shall not exceed 97 ug/dscm corrected to 7 percent oxygen. No later than October 14, 2008, combined emissions of arsenic, beryllium, and chromium shall not exceed 92 ug/dscm corrected to 7 percent oxygen.

Applicable Compliance Method:
Compliance shall be determined by emission testing, using Method 29, provided in Appendix A of 40 CFR, Part 60.

After performance testing, compliance shall be determined by compliance with the applicable Operating Parameter Limits specified in 40 CFR 63.1209(n), established during the most recent CPT and reported in the subsequent NOC.

10. Emission Limitation:
Beryllium emissions from the stack shall not exceed 10 grams per 24-hour period.

Applicable Compliance Method:
Compliance shall be determined by emission testing, using Method 29, provided in Appendix A of 40 CFR, Part 60.

11. Emission Limitation:
Carbon monoxide emissions from the stack shall not exceed 100 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen and 95.26 tons per year; or Hydrocarbons emissions from the stack shall not exceed 10 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, reported as propane, and 15.00 tons per year.

Applicable Compliance Method:
Compliance shall be determined by operating the continuous emissions monitoring system (CEMS) for carbon monoxide or hydrocarbons. Or, if required by Ohio EPA, compliance shall be determined by emissions testing, using Method 10 and Methods 18, 25 or 25A, provided in Appendix A of 40 CFR, Part 60.

Compliance with the annual limit shall be determined by making the necessary conversion from the continuous emissions monitoring system to ton/year.

12. Emission Limitation:
Combined hydrochloric acid and chlorine gas emissions from the stack shall not exceed

77 parts per million by volume, expressed as hydrochloric acid equivalents, dry basis and corrected to 7 percent oxygen and 281.17 tons per year. No later than October 14, 2008, combined hydrochloric acid and chlorine gas emissions from the stack shall not exceed 32 parts per million by volume, expressed as hydrochloric acid equivalents, dry basis and corrected to 7 percent oxygen and 116.85 tons per year.

Applicable Compliance Method:
Compliance shall be determined by emission testing, using Method 26A, 320, or 321 provided in Appendix A of 40 CFR, Part 60.

Compliance with the annual limit shall be determined by calculation, using the maximum process flow rate in dscm and the most recent result from emission testing, corrected to 7 percent oxygen.

After performance testing, compliance shall be determined by compliance with the applicable Operating Parameter Limits specified in 40 CFR 63.1209(o), established during the most recent CPT and reported in the subsequent NOC.

13. Emission Limitation:
Particulate emissions from the stack shall not exceed 34 mg/dscm corrected to 7 percent oxygen and 28.27 tons per year. No later than October 14, 2008, particulate emissions from the stack shall not exceed 0.013 grain/dscf corrected to 7 percent oxygen and 24.74 tons per year.

Applicable Compliance Method:
Compliance shall be determined by emission testing, using Method 5 or 5I, provided in Appendix A of 40 CFR, Part 60.

Compliance with the annual limit shall be determined by calculation, using the maximum process flow rate in dscm and the most recent result from emission testing, corrected to 7 percent oxygen.

After performance testing, compliance shall be determined by compliance with the applicable Operating Parameter Limits specified in 40 CFR 63.1209(m), established during the most recent CPT and reported in the subsequent NOC.

14. Emission Limitation:
This emissions unit shall achieve a destruction and removal efficiency (DRE) of 99.99% for each selected principle organic hazardous constituent (POHC).

Applicable Compliance Method:
Compliance shall be determined by emissions testing, using approved U.S. EPA reference methods, and the following equation:

$$DRE = [1 - (Wout/Win)] \times 100\%$$

where:

Win = mass feedrate of one POHC in a waste feedstream; and
Wout = mass emission rate of the same POHC present in exhaust emissions prior to release to the atmosphere.

After performance testing, compliance shall be determined by compliance with the applicable Operating Parameter Limits specified in 40 CFR 63.1209(j), established during the most recent CPT and reported in the subsequent NOC.

15. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:
Compliance shall be determined by operating the continuous opacity monitoring system (COMS). Or, if required by Ohio EPA, compliance shall be determined using Method 9, provided in Appendix A of 40 CFR, Part 60.

16. Emission Limitation:
There shall be no visible particulate emissions of fugitive dust.

Applicable Compliance Method:
Compliance shall be determined by compliance with 40 CFR 63.1206(c)(5) pertaining to Combustion System Leaks and with 40 CFR 63.1209(p) pertaining to the Maximum combustion chamber pressure. Or, if required by Ohio EPA, compliance shall be determined using Method 22, provided in Appendix A of 40 CFR, Part 60.

17. The permittee shall notify the Ohio EPA of all Comprehensive Performance Tests and Confirmatory Tests per the requirements of 40 CFR 63.1207(e). The content of the performance test plan shall comply with the requirements of 40 CFR 63.1207(f).

Personnel from 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.

Except as provided by 40 CFR 63.1207(j)(4) and (j)(5), within 90 days of completion of a Comprehensive Performance Test, the permittee must postmark a Notification of

Compliance documenting compliance with the emission standards and continuous monitoring system requirements, and identifying operating parameter limits under 40 CFR 63.1209.

Except as provided by 40 CFR 63.1207(j)(4), within 90 days of completion of a confirmatory performance test, the permittee must postmark a Notification of Compliance documenting compliance or noncompliance with the applicable dioxin/furan emission standard.

Notifications of Compliance are to be submitted to the Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

1. The limits and requirements contained in this permit supersede those for N001 established in PTI # 17-104.

Issued: 3/22/2007

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (N001) - Hazardous waste incinerator (97.8 mmBtu/hour), equipped with a spray dryer, an electrostatic precipitator and a scrubber

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: 3/22/2007

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (P001) - Container processing

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compounds shall not exceed 3.0 lbs/hr and 13.14 tons per year. See sections A.I.2.b through A.I.2.p
OAC rule 3745-17-07(A)	Visible particulate emissions from the roof vents shall not exceed 20% opacity as a 6-minute average.
OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
OAC rule 3745-17-08(B)	The permittee shall utilize reasonable available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.877 lb/hour.
40 CFR Part 61, Subpart FF	The requirements specified by this subpart are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.p.
40 CFR Part 63, Subpart DD	The requirements specified by this subpart are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.p.
40 CFR Part 63, Subpart PP	See section A.I.2.o.

2. Additional Terms and Conditions

2.a Container processing operations include: Container receiving and sampling station; 4 drum heaters where material is heated to make it more liquid;

Container alter/routing/punch; Lab pack storage/repackaging; Container splitting station; Container discrepancy and reactive container station; Container pump out to tank farm; Direct drum pump out to Incinerator; Absorbent add station; Container storage room; and Extruder.

2.b The container processing operations, identified in section 2.a above, shall be housed within a building except for portions of the Extruder. For safety-related reasons, the top portion of the Extruder is located on a mezzanine outside of the Container Processing Building. All processing activities occur within the confines of the Extruder under vapor recovery.

2.c The cover and/or opening (e.g., bungs, hatches, and sampling ports) of each container (e.g., drum, tote) located within this emissions unit shall be maintained in a closed, sealed position at all times that waste is in the container except when it is necessary to use the opening for waste loading, removal, inspection, or sampling.

2.d The cover and/or opening (e.g., bungs, hatches, and sampling ports) of each container (e.g., drum, tote) located within this emissions unit shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, initially and thereafter at least once per year by the methods specified in 40 CFR 31.355(h).

2.e When a waste is transferred into a container by pumping, the transfer shall be performed by using a submerged fill pipe. The submerged fill pipe outlet shall extend to within two fill pipe diameters of the bottom of the container while the container is being loaded. During loading of the waste, the cover shall remain in place and all openings shall be maintained in a closed, sealed position except for those openings required for the submerged fill pipe, those openings required for venting of the container to prevent physical damage or permanent deformation of the container or cover.

2.f The vapor recovery system, or closed-vent system, shall be in operation with operational snorkels in place to capture emissions when waste is being processed. The snorkel(s) is(are) to be adequately placed over the activity in such a manner that maximum capture is achieved.

2.g The vapor recovery system shall route organic vapors to the incinerator, emissions unit N001, and/or to the carbon adsorption system. The incinerator and/or the carbon adsorption system shall be in operation when waste is being processed within this emissions unit.

2.h The vapor recovery system upstream from the ventilation header blower shall be operated at a pressure below atmospheric pressure so that there is adequate suction, or inward flow, at each snorkel.

2.i The incinerator, as a control device for this emissions unit, shall achieve a destruction efficiency of 99.99% for organic compounds.

2.j The carbon adsorption system shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

2.k The carbon adsorption system shall consist of two or more trains of a primary and a secondary carbon box operated in series. The trains shall be operated in parallel. All boxes shall be the same size and have a maximum design flow rate of no less than 10,000 cfm. The carbon adsorption system shall be installed, operated and maintained in accordance with the "Von Roll's Routine Maintenance Procedure for Vapor Recovery Management" dated October 27, 2006, (also referred to as the "Routine Maintenance Procedure").

2.l The existing carbon within the carbon adsorption system shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. Carbon breakthrough will be determined by a reading of 50 ppm as a 60-minute rolling average from the Total Hydrocarbon (THC) Continuous Emissions Monitor (CEM) located between the first and second carbon bed in each train. This CEM shall be referred to as an Inter-Box CEM. The permittee is permitted to replace the carbon more frequently, i.e., before breakthrough is indicated, if the permittee determines that the carbon within any box is not effectively adsorbing volatile organic compounds, including benzene.

2.m The vapor recovery system, or closed-vent system, shall comply with the following requirements:

i. Be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h).

ii. All gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

iii. One or more devices which vent directly to the atmosphere may be used on the closed-vent system provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the

closed-vent system resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.

2.n The permittee shall control equipment leaks from each equipment component of this emissions unit in accordance with sections 61.242 through 61.247 in 40 CFR Part 61, Subpart V - National Emission Standards for Equipment Leaks.

2.o 40 CFR 63.688 (standards for containers) refers to 40 CFR Part 63, Subpart PP for the control of air emissions from a container. The following requirements are specified for the containers located within this emissions unit:

Container Description	Requirement
Having a design capacity greater than 0.1 m^3 and less than or equal to 0.46 m^3	Permittee controls air emissions from the container in accordance with Container Level 1, 2 or 3 controls, as specified in 40 CFR Part 63, Subpart PP.
Having a design capacity greater than 0.46 m^3 and the container is not in light material service as defined in Section 63.681	
Having a design capacity greater than 0.46 m^3 and the container is in light material service as defined in Section 63.681	Permittee controls air emissions from the container in accordance with the standards for Container Level 2 or 3 controls, as specified in 40 CFR Part 63, Subpart PP.
Having a design capacity greater than 0.1 m^3 and is used for treatment of an off-site material by a waste stabilization process as defined in Section 63.681.	Permittee controls air emissions from the container at those times during the process when the off-site material in the container is exposed to the atmosphere in accordance with the standards for Container Level 3 controls, as specified in 40 CFR Part 63, Subpart PP.

2.p When this emissions unit is subject to the requirements of 40 CFR Part 61, Subpart FF (National Emissions Standards for Benzene Waste Operation), the permittee is exempt from Section 63.688 (standards for containers) of 40 CFR Part 63, Subpart DD. Because benzene may be present in the waste handled by this emissions unit at any given time, the requirements contained in both 40 CFR Part 61, Subpart FF and 40 CFR Part 63, Subpart DD serve as a basis for determining the Best Available Technology established pursuant to OAC rule 3745-31-05(A)(3).

2.q Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous THC monitoring system, designed to ensure continuous valid and representative readings of THC emissions in units of parts per million. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality

control plan and a logbook dedicated to the continuous THC monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of parts per million, in accordance with and at the frequencies required per 40 CFR Part 60.

Emissions Unit ID: P001

II. Operational Restrictions

1. The permittee shall operate a sufficient number of trains in the carbon adsorption system to ensure that the flow rate through each primary carbon box does not exceed the manufacturer's recommended maximum design air flow rate.

2. When breakthrough within a train of the carbon adsorption system occurs, the permittee shall discontinue the use of that train as soon as possible but not longer than 12 hours after detection of breakthrough. The change-out must be completed within 48 hours after the use of the train that has been discontinued. The change-out shall be performed such that the secondary carbon box becomes the primary box and a new carbon box is installed as the secondary box.

3. If an Inter-Box CEMS reading is equal to or greater than 50 ppm on a 60-minute rolling average within 15 days after a change-out, the permittee is not required to initiate and complete a new change-out of the primary box pursuant to the Routine Maintenance Procedure. Instead, as expeditiously as possible, the permittee shall initiate and complete an investigation of the cause of the elevated Inter-Box CEMS reading to determine if the carbon within the primary box actually is spent or otherwise not functional. If the permittee determines the carbon within the primary box is spent or otherwise not functional, the permittee shall immediately initiate and complete a change-out of the primary box pursuant to the Routine Maintenance Procedure. If the permittee determines that the elevated Inter-Box CEMS reading is not caused by spent or non-functional carbon, the permittee shall implement corrective actions, if any to eliminate the cause(s) of the elevated readings. If within 5 days after the elevated Inter-Box CEMS reading, the permittee cannot determine the cause of the elevated reading, the permittee immediately shall initiate and complete a change-out of the primary box pursuant to the Routine Maintenance Procedure.

4. The permittee shall maintain on-site a sufficient supply of fresh carbon or a spare carbon box containing fresh carbon to enable a change-out procedure to be performed in a timely manner.

III. Monitoring and/or Recordkeeping Requirements

1. Each cover and/or opening of the containers located within this emissions unit shall be visually inspected initially and quarterly thereafter to ensure that they are closed and gasketed properly, if not being processed at the time. If a broken seal or gasket is identified, first efforts at repair shall be made as soon as practicable, but not later than 15 calendar days after identification. Each cover and/or opening of the containers shall also be inspected initially and at least one per year by the methods specified in Section 61.355(h) to determine if the containers are operating with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background.

2. The permittee shall perform quarterly, visual inspections of the vapor recovery system and control devices (incinerator and carbon adsorption system). The visual inspection

shall include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connection.

If visible defects are observed during an inspection, or if other problems are identified, or if detectable emissions are measured, a first effort to repair the vapor recovery system and control device shall be made as soon as practicable but no later than 5 calendar days after detection. Repair shall be completed no later than 15 calendar days after the emissions are detected or the visible defect is observed. Exception for delay of repair would be allowed per 40 CFR 61.350.

3. The permittee shall install, calibrate, operate and maintain equipment to continuously monitor and record total hydrocarbons (THC), in units of parts per million, between the first and second carbon bed of each train of the carbon adsorption system (Inter-Box CEMS) for the purpose of determining breakthrough. A THC monitor and recorder shall also be on the exhaust vent stream.

   a. A statement of approval of the continuous THC monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the performance specifications tests and a statement by the Agency that the system is considered approved for use in accordance with the requirements of 40 CFR Part 60, Appendix B, performance Specification 8A - Specifications and Test Procedures for Total Hydrocarbon Continuous Monitoring Systems in Stationary Sources. Proof of approval shall be made available to the Director (Ohio EPA Northeast District Ohio) upon request.

      Each continuous monitoring system consists of all the equipment used to acquire and record data in parts per million, and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

   b. The permittee shall operate and maintain equipment to continuously monitor and record THC emissions in units of parts per million. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

   c. The permittee shall maintain records of data obtained by the continuous THC monitoring system including, but not limited to:

i. emissions of THCs in parts per million on an instantaneous (one-minute) basis;

ii. emissions of THCs in parts per million on a 60-minute rolling average;

iii. results of quarterly cylinder gas audits;

iv. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

v. results of required relative accuracy test audit (or PS 8A alternative);

vi. hours of operation of the emissions unit, continuous THC monitoring system, and carbon adsorption system;

vii. the date, time, and hours of operation of the emissions unit without the carbon adsorption system and/or the continuous THC monitoring system;

viii. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous THC monitoring system; and

ix. the reason (if known) and the corrective actions taken (if any) for each such event in (c.vii) and (c.viii). These records shall be kept at the facility no less than 3 years and be available for inspection upon request by the Ohio EPA.

4. With respect to each Inter-Box CEMS, the permittee shall comply with Performance Specification 8A, except that the permittee shall:

a. to the extent that the permittee utilizes two ducts between each primary and each secondary box for pressure control purposes, be permitted to utilize a sample location on only one of the two ducts;

b. keep the sample probe heated to approximately the same temperature as, or slightly higher than, the temperature inside the duct in which it is inserted;

c. establish a span value of 200 ppm propane; and

d. utilize the following three test points for conducting calibration error tests:

i. Zero Level: zero to 0.1 ppm;
ii. Mid-Level: 40 to 60 ppm;
iii. High-Level: 140 to 160 ppm.

5. On a continuous basis, the permittee shall direct the Inter-Box CEMS data to the

facility's control system and shall maintain an alarm that will sound whenever breakthrough between a primary and a secondary carbon box occurs.

6. During times when a train of the carbon adsorption system is not in use, the permittee shall record "no flow" instead of a THC concentration for the respective Inter-Box CEMS.

7. The permittee shall maintain, and retain for the life of each control device, the following records:

   a. a statement signed and dated by the permittee certifying that the vapor recovery system and control device (incinerator and carbon adsorption system) are designed to operate at the documented performance level when this emissions unit is operating at the highest load or capacity. The document will therefore include the following:

      i. a statement certifying that the vapor recovery system is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, is designed so that all gauging and sampling devices be gas-tight except when gauging or sampling is taking place, and that any rupture discs remain closed during normal operation.

      ii. a statement certifying that the incinerator can achieve a 99.99% reduction efficiency for organic compounds when this emissions unit is operating at its highest load or capacity; and

      iii. a statement certifying that the carbon adsorption system can achieve a 95% control efficiency for organic compounds when this emissions unit is operating at its highest load or capacity.

   b. the design analysis showing control device performance. The design analysis shall include specifications, drawings, schematics, and piping and instrumentation diagrams prepared by the owner or operator, or the control device manufacturer or vendor that describe the control device design based on acceptable engineering texts.

      For the incinerator, the design analysis shall consider the vent stream composition, constituent concentrations, and flow rate. The design analysis shall also establish the design minimum and average temperature in the

combustion zone and the combustion zone residence time.

For the carbon adsorption system, the design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity and temperature. The design analysis shall also establish the design exhaust vent stream organic compound concentration level, capacity of carbon bed, type and working capacity of activated carbon used for carbon bed, and design carbon replacement interval based on the total carbon working capacity of the control device and source operating schedule.

8. The permittee shall install, calibrate, maintain and operate according to the manufacturer's specifications a device equipped with a continuous recorder to monitor the pressure in the vapor recovery system upstream from the ventilation header blower. This record shall be reviewed at least once per day.

9. The permittee shall install, calibrate, maintain and operate according to the manufacturer's specifications a device to continuously monitor the temperature in the combustion chamber of the incinerator, as a control device for this emissions unit. The temperature monitoring device shall have an accuracy of plus or minus 1 percent of the temperature being monitored in degree Celsius, or plus or minus 0.5 degree Celsius, whichever is greater. This record shall be reviewed according to the terms and conditions for emissions unit N001.

10. The permittee shall maintain records that contain the following information:

    a. a record of any time when the vapor recovery system was not in operation when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action taken, if any;

    b. any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action taken, if any;

    c. any record indicating that the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action, if any;

    d. any time when pumping occurred without submerged fill. The record should include the date and an explanation; and

    e. any record indicating detectable emissions from the vapor recovery system, cover and/or opening of any container, and/or any equipment component of this emissions unit. This record may be included in the monthly Leak Detection and

Repair Program report.

11. The permittee shall perform daily checks, when weather conditions allow, for any fugitive visible emissions for one calendar quarter. The presence or absence of any fugitive visible emissions shall be noted in an operations log. If fugitive visible emissions are observed, the permittee shall also note the following in the operations log:

    a. the location and color of the emissions;
    b. whether the emissions are representative of normal operations;
    c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    d. the total duration of any visible emission incident; and
    e. any corrective actions taken to eliminate the visible emissions.

    If no visible emissions are noted for each daily inspection during that calendar quarter, then the frequency may become weekly. If visible emissions are noted during a weekly inspection, the permittee shall revert to daily inspections and perform daily inspections until no visible emissions are documented for an entire calendar quarter, at which time the permittee may again perform inspections on a weekly basis.

    If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period. With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

    a. any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;

b. any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;

c. any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;

d. any record indicating detectable emissions from the vapor recovery system, cover and/or opening of any container, and/or any equipment component of this emissions unit; and

e. each day or week during which any visible emissions were observed and the corrective actions taken.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions. the written reports shall be submitted quarterly to the Ohio EPA Northeast District Office, i.e., by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters.

If no deviation occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

V. Testing Requirements

1. Emission Limitation:
Organic compounds shall not exceed 3.0 lbs/hr and 13.14 tons per year

Applicable Compliance Method:
If required by Ohio EPA, compliance shall be determined by emission testing for this emissions unit in accordance with Methods 18, 25 or 25A of 40 CFR Part 60, Appendix A.

2. Emission Limitation:
Visible particulate emissions from the roof vents shall not exceed 20% opacity as a 6-minute average.

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

3. Emissions Limitation:
Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

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

4. Emissions Limitation:
Particulate emissions shall not exceed 0.887 lb/hour.

Applicable Compliance Method:
If required by Ohio EPA, compliance shall be determined by emission testing for this emissions unit in accordance with Method 5 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. The limits and requirements contained in this permit supersede those for P001 established in PTI # 17-104.

Emissions Unit ID: P001

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (P001) - Container processing

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None