State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
COLUMBIANA COUNTY
Application No: 02-18003

DATE: 7/8/2003

A and L Salvage Inc
Stephen Callahan
P.O. Box 333
Lisbon, OH 44432

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA NEDO Akron Met Area Trans Study WV PA

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: To be entered upon final issuance**
Terms and Conditions	**Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-18003

Application Number:	02-18003
APS Premise Number:	0215060342
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	A and L Salvage Inc
Person to Contact:	Stephen Callahan
Address:	P.O. Box 333 Lisbon, OH 44432

Location of proposed air contaminant source(s) [emissions unit(s)]:
11225 State Route 45
Lisbon, **Ohio**

Description of proposed emissions unit(s):
Modification to remove the operational restriction regarding asbestos disposal.

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

_____
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection

Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

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 To Install 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.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

15. 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 this Permit to Install.

B. 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
PE	3.49

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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	Applicable Rules/Requirements
F002 - Landfill operations at a construction and demolition landfill: waste unloading and wind erosion.	OAC rule 3745-31-05 (A)(3)
	40 CFR 61.149 through 61.151, 61.153 and 61.154
	OAC rule 3745-20-05 through 3745-20-08
	OAC rule 3745-17-08 (B)
	OAC rule 3745-17-07(B)(1)
Asbestos-containing material activities	OAC rule 3745-31-05(A)(3)

Applicable Emissions Limitations/Control Measures	
Visible emissions not to exceed 10 percent opacity as a six-minute average.	The requirements specified by this rule is equivalent to those established pursuant to OAC rule 3745-31-05 (A)(3).
Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust	
Particulate emissions shall not exceed 3.49 tons per year.	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).	
No visible emissions from asbestos-containing materials during on-site transportation, transfer, unloading, deposition or compacting operations.	
The requirements specified by this rule is equivalent to those established pursuant to OAC rule 3745-31-05 (A)(3).	

2. Additional Terms and Conditions

2.a The landfill areas that are covered by this permit and subject to the requirements of OAC 3745-31-05 are listed below:

Entire landfill area.

2.b The permittee shall employ best available control measures on all landfill operations associated with the load-in of C&DD for the purposes of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to dispose of material with an inherently high moisture content to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

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

2.d The permittee shall employ best available control measures for wind erosion from the surface of the landfill 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 lowering drop heights during periods of high wind speed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The above-mentioned control measures shall be employed for wind erosion from the landfill if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for the landfill cell that is covered with snow

and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

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

B. Operational Restrictions

1. There shall be no open burning, in violation of OAC Chapter 3745-19, at this facility.

2. In accordance with the conditions of this permit, the permittee is authorized to accept and dispose of asbestos-containing waste materials subject to the provisions of NESHAP, 40 CFR Part 61, Subparts A and M and the regulations adopted by the Ohio EPA in Chapter 3745-20 of the Ohio Administrative Code. Waste materials exempted from these regulations are subject to regulation as C&DD.

3. The permittee shall inspect each load of asbestos containing-material delivered. The inspection shall consist of visual examination of each load, sufficient to determine whether the friable asbestos-containing materials are received in intact, leak-tight containers labeled with appropriate hazard warning labels, name of the waste generator and location and shall determine whether the waste shipment records (WSR) required by Section *C.8.*, accompany the consignment and accurately describe the waste material and quantity.

4. If on the basis of the inspection, the waste material is found improperly received, the load shall be disposed of in accordance with the procedures in the "Asbestos Spill Contingency Plan" described in Section B.8., and the discrepancy notation shall be made on the waste shipment record.

5. Deposition and burial operations shall be conducted in a careful manner that prevents handling by equipment or persons that causes asbestos-containing waste materials to be broken up or dispersed before the materials are buried.

6. Unless a natural barrier adequately deters access by the general public, either warning signs and fencing must be installed and maintained as follows, or it must be covered with at least 15 centimeters (6 inches) of compacted non-asbestos-containing material, or other equally effective

dust suppression agents may be used upon prior approval by the Administrator. Warning signs must be displayed at all entrances and at intervals of 100 meters (330 feet) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material was deposited. The warning signs must:

a. Be posted in such a manner and location that a person can easily read the legend; and,

b. Conform to the requirements for a 51 cm X 36 cm (20" X 14") upright format warning sign specified in 29 CFR 1910.145(d)(4) and this paragraph; and,

c. Display the following legend in the lower panel with letter sizes and styles of a visibility at least equal to those specified in this paragraph.

ASBESTOS WASTE DISPOSAL SITE
DO NOT CREATE DUST
BREATHING ASBESTOS IS HAZARDOUS TO YOUR HEALTH

Notation: The lettering shall be 2.5 cm (1 inch) Sans Serif, Gothic or Block, 1.9 cm (3/4 inch) Sans Serif, Gothic or Block or 14 Point Gothic. Spacing between any two lines must be at least equal to the height of the upper of the two lines.

7. The permittee shall cover asbestos wastes in accordance with the following:

a. As soon as practicable after the placement of friable asbestos, but no later than the end of each working day and before compacting, the asbestos-containing waste material deposited at the site during the operating day shall be covered with at least twelve inches of non-asbestos containing material.

b. Care shall be taken to ensure disposed asbestos shall not be re-excavated in subsequent operations. Any accidentally exposed material shall be immediately recovered in accordance with the provisions of condition *B.7.a.* unless the material has been substantially compromised, in which case this facility will implement the appropriate provisions of the "Spill Contingency Plan" as required by condition *B.8.*

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

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

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

10. Upon closure, comply with all the provisions of rule 3745-20-07.

11. Leachate shall not be used for dust control.

C. Monitoring and/or Record keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each C&DD landfill cell in accordance with the following frequencies:

Landfill Cell Identification	Minimum load-in inspection frequency
Active cell(s)	Daily
Asbestos activity	Daily

2. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from C&DD landfill cell surfaces in accordance with the following frequencies:

Landfill Cell Identification	Minimum Wind Erosion Inspection Frequency
Active cell(s)	Daily
Asbestos activity	Daily

3. No inspection shall be necessary for wind erosion from the surface of a C&DD landfill cell when the cell is covered with snow and/or ice and for any landfill cell activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-mentioned events shall be performed as soon as such event(s) has (have) ended, except if the next required

inspection is within one week.

4. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in of a C&DD landfill cell, and wind erosion from the surface of a C&DD landfill cell. The inspections shall be performed during representative, normal landfill operating conditions.

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

6. 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, for wind erosion from landfill surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 6.d shall be kept separately for (i) the load-in operation, and (ii) the landfill surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

7. The permittee shall annually record the amount of C&DD waste deposited in the landfill.

8. The permittee shall require that all waste shipments received from NESHAP regulated facilities as defined in 40 CFR 61.141, be accompanied by a Waste Shipment Record as described in 40 CFR 61.150(d)(1).

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

b. As soon as possible and no longer than 30 days after receipt of the waste, send a copy of the signed waste shipment record to the waste generator.

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

9. Maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area.

D. Reporting Requirements

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

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

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

c . Each instance when a leachate sample collected from cells that store asbestos used to control fugitive dust contained detectable quantities of asbestos..

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

3. The permittee shall prepare and submit to Ohio EPA, Northeast District Office, quarterly reports summarizing asbestos disposal activities. This report must contain the following information:

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

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

c. These reports shall be submitted no later than January 15, April 15, July 15 and October 15 and shall cover the previous calendar quarter.

4. Submit to Ohio EPA, Northeast District Office, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities.

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

a. Scheduled starting and completion dates.

b. Reason for disturbing the waste.

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

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

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

E. Testing Requirements

1. Compliance with the visible emission limitations from the landfill surfaces identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

2. Emission Limitation: 3.49 tons of particulate emissions per year.

Applicable Compliance Method:
Compliance shall be demonstrated by the following equation:

Landfill Operations: From AP-42, Section 13.2.4, "Aggregate Handling and Storage Pile", version 1/95.

$$EO = k \times 0.0032 \times (U/5)^{1.3}/(M/2)^{1.4} \times WA \times 365/2000$$

where

EO = particulate emission, tons per year
k = constant, 0.74
U = mean wind speed, 7 miles per hour
M = material moisture content, 12%
WA = waste acceptance, tons per year
365 = conversion factor, days per year
2000 = conversion factor, pounds per ton

Wind Erosion: From Air Pollution Engineering Manual, Chapter 4, "Fugitive Emissions", Wind Erosion, p. 136.

$$EW = 1.7 \times (s/1.5) \times [(365-p)/235] \times (f/15) \times A \times (1-0.8)/2000$$

where

EW = particulate emissions, tons per year
s = silt content, 6.4%
p = number of days with greater than 0.01 inches of precipitation per year, 150
f = percent of time that wind speed exceeds 12 miles per hour, 30%
A = area of landfill susceptible to wind erosion, 6.9 acres for disposal
0.8 = 80% control efficiency for good operating practices
2000 = conversion factor, pounds per ton

Total particulate emissions:

E = EO + EW

where

E = total particulate emissions, tons per year
EO = particulate emissions from landfill operations, tons per year
EW = particulate emissions from wind erosion, tons per year

3. Emission Limitation

No visible emissions from asbestos-containing materials during on-site transportation, transfer, unloading, deposition or compacting operations.

Applicable Compliance Method

Compliance shall be determined through the monitoring and record keeping requirements of Section C. If required, compliance shall also 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. Alternate, equivalent methods may be used upon approval by Ohio EPA, Northeast District Office.

4. Emission Limitation

No detectable asbestos in the leachate collected from cells that store asbestos used to control fugitive dust.

Applicable Compliance Method

Compliance shall be determined by demonstrating that the leachate contains no detectable asbestos in accordance with Test Methods in EPA-600/4-83-043. Alternate, equivalent methods may be used upon approval by Ohio EPA, Northeast District Office.

5. Asbestos activities in this permit shall be considered to be those activities involving material defined as "asbestos-containing waste material" in OAC rule 3745-20-01 or "asbestos-containing

waste" in 40 CFR 61.141 containing more than 1 percent asbestos as determined using the methods specified in Appendix A, Subpart F, 40 CFR Part 763 Section 1, Polarized Light Microscopy.

F. Miscellaneous Requirements

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

2. The terms and conditions of this PTI replaces the terms and conditions for this emissions unit as written in PTI number 02-13949, issued June 21, 2000.

NEW SOURCE REVIEW FORM B

PTI Number: 02-18003 Facility ID: 0215060342

FACILITY NAME A and L Salvage Inc

FACILITY DESCRIPTION Modification to remove the operational restriction regarding asbestos disposal. CITY/TWP Lisbon

SIC CODE 4953 SCC CODE EMISSIONS UNIT ID F002

EMISSIONS UNIT DESCRIPTION Landfill operations at a construction and demolition landfill: waste unloading and wind erosion.

DATE INSTALLED

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	na	3.49	na	3.49
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? 40 CFR Part 61, Subpart M PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination Like sources, best engineering judgement, NESHAP established requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES XX NO

IDENTIFY THE AIR CONTAMINANTS: